

ENFORCEMENT CONFIDENTIAL

UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

Facility Inspection Program

1650 Arch Street

Philadelphia, PA 19103

(215) 814-2962

Date: July 15, 2015

From: Robert Staves
EPA Inspector

To: Samantha Beers
Director, OECEJ

Re: Penn United Technologies Inc.
799 North Pike Road
Cabot, Pennsylvania 16023

RCRA Number: PA0000193409

Based on the inspection conducted on August 27, 2014, the following areas of concern were noted:

- At the time of inspection, there were 12 full, 55-gallon plastic drums containing waste solvents and coolants (F001), and two large, full, cardboard boxes containing spent filter cartridges (D003) in a secondary area approximately 30 yards away from the designated satellite accumulation and collection area.
- None of the containers in the secondary area mentioned above had an accumulation start date at the time of the inspection.
- There is a small workshop at one end of Building #1. At the time of inspection, there were approximately 20 spent, 6-ft fluorescent light bulbs duct taped together and leaning against the wall in a corner. The light bulbs were not in any type of container to prevent breakage, were not labeled, and did not have an accumulation start date.

- In Building #4, gold and palladium filter cartridges (D003) from the electroplating line are stored, to be recycled, along a back wall within the room. A small closet type room within Building #4 is used as a satellite accumulation area for the gold and palladium material collected from the filters (F009). Just outside of the satellite accumulation room door were two (2) full, 55-gallon, blue, plastic drums containing gold and palladium cyanide stripper solution and solids that originated from the electroplating line. Mr. Berteotti stated that these drums were considered to be a second less than 90-day hazardous waste storage area that is separate from the basement of building #6. The drums were labeled, but did not have an accumulation start date.
- In the basement of Building #6 is a less than 90-day hazardous waste accumulation area. At the time of inspection, there were 24 full, plastic (blue & black) 55-gallon drums. Five of the drums were labeled non-hazardous waste, while the remaining 19 drums were labeled having hazardous wastes as they contained spent sulfuric acid, spent hydrochloric acid, and spent cyanide (F006) all coming from the electroplating process line. Of the 19 plastic drums labeled hazardous waste, 10 of the hazardous waste drums containing spent sulfuric acid, spent hydrochloric acid, and spent cyanide (F006) did not have an accumulation start date.
- Approximately 20 feet from the only designated less than 90-day hazardous waste area is a short wall about 3-foot high that separates the room. On the opposite side of this wall, this inspector noted a black, metal 55-gallon drum that was full of plating slurry (F006) from the electroplating line and labeled as a hazardous waste. This drum was not in the designated less than 90-day area.
- The drum of plating slurry mentioned above did not have a start accumulation date.
- About 15 feet away from the black, metal drum was an orange cardboard box containing spent filter cake (D003). This box of hazardous waste was not in the designated less than 90-day storage area.
- In Building #1, there is a room designated as the Universal Waste accumulation area. At the time of inspection, there were two large wooden boxes (3ft x 6ft) full of spent light bulbs and several open and taped closed boxes of spent light bulbs. The total number of bulbs was estimated to be 200. When asked how long the bulbs have been there, Mr. Berteolli stated he was not sure because the Facility has no tracking system in place to quantify the amount of bulbs or the length of time they have accumulated. Mr. Berteolli stated that he is not sure of how long they have been there, but it has been at least several

Resource Conservation and Recovery Act
Subtitle C, Compliance Evaluation

Penn United Technologies Inc.
799 North Pike Road
Cabot, Pennsylvania 16023

RCRA I.D. No: PA0000193409

Date of Inspection: August 27, 2014

EPA Representative:

Robert Staves
Environmental Protection Specialist
(215) 814-2962
staves.robert@epa.gov

Facility Representative:

Steve Berteotti
Environmental, Health & Safety Manager
(724) 352-1507 x.4610
steve_berteotti@pennunited.com

Background

The EPA Region III's Office of Enforcement Compliance and Environmental Justice (OECEJ) in Philadelphia, PA received a request from EPA Region III's Land & Chemicals Division to conduct a RCRA C Compliance Inspection at Penn United Technologies Inc. (the Facility) located in Cabot, Pennsylvania. The inspection was assigned to Robert Staves (the EPA inspector). Included with the request was information which indicated that the Facility is a Large Quantity Generator of hazardous waste. Prior to conducting the inspection, the EPA inspector did contact PADEP to notify them of the upcoming inspection. An e-mail was sent to Renee Bartholomew, Chief of the Enforcement & Information Section. Ms. Bartholomew forwarded the e-mail to the appropriate PADEP regional office. The Facility was not notified prior to the inspection.

The Facility is an integrated business that includes tool and die manufacturing and repair, metal stamping, precision assembly, and electroplating. The Facility is comprised of seven buildings that total about 550,000 sq. ft under roof.

Inspection

The EPA inspector arrived at the Facility at approximately 9:00 am. Upon entering the Facility's reception area, this inspector presented his credentials to the receptionist and requested to speak with the environmental coordinator. A few minutes later, the EPA inspector was greeted by Mr. Berteotti. The EPA inspector presented his credentials to the Facility representative identifying him as an authorized representative of the Agency. The EPA inspector provided the Facility representative with a brief description of the purpose and scope of the subject inspection. The EPA inspector next asked the Facility personnel to provide a description of the Facility and its activities including the types of waste generated at the Facility and how the waste is managed on site. Mr. Berteotti explained the various Facility areas, the manufacturing processes, storage areas, and waste streams.

Building #1 houses the tool & die manufacturing process, as well as, the stamping process. The tool and die components are manufactured from various steel products by machining and grinding operations. The stamping process forms metal into numerous components of varying size and shape with power presses. Waste streams in this building include lubricating oils, waste oil, alcohol, coolant, spent coolant, and trash.

Building #2 houses a stamping process, second operations, and warehousing. The stamping process again is various metal components pressed by machines into various sizes and shapes. Second operations refers to metal components used in the medical industry. The components are cleaned and packaged for shipment to customers that assemble medical devices. The warehousing area is an area that stores materials that are used throughout the different manufacturing locations. Waste streams in this building include trichloroethylene (F001), oily waste water, waste lubricating oil, and trash.

Building #3 is maintenance. Maintenance is housed in this one location, but services all operating areas of the facility and routine maintenance functions. Waste streams in this building include parts cleaning solutions (F006, D039), fluorescent light bulbs, and trash.

Building #4 houses the electroplating operations. Metal components either manufactured by Penn United or received from customers are electroplated with various metals including nickel, tin, tin-lead, gold, silver, or palladium. Waste streams in this building include electroplating rinse (D002, D008), electroplating sludge (F006), gold cyanide stripper solution and solids (D003, F009), and gold and palladium filter cartridges (D003). Metal and non-precious metal filters are recycled or used as an ingredient.

Building #6 houses the tool and die manufacturing and precision assembly processes. Tool and die components are manufactured from various steel products by machining and grinding processes. Precision assembly consists of various manufactured electronic components and tools which are assembled by either hand or machine. Waste streams from this building includes, waste coolants and trash.

Following are the findings from the inspection:

Facility Observations:

- The tool and die manufacturing process in building #1 is done on three long, parallel, production lines. There used to be four production lines until line #3 was completely removed a few years ago. The waste lubricating oils, waste coolants (F001) and waste alcohol coming from these production lines are collected in 55-gallon drums and store in a central location (see photo # 1). After the plastic 55-gallon drums are full, they are relocated approximately 30 yards away to where the removed production line #3 once stood. (See photos # 2, 3, and 4).

At the time of inspection, there were 12 full, 55-gallon plastic drums containing waste solvents and coolants (F001), as well as, two large, full, cardboard boxes containing spent filter cartridges (D003) in this secondary area. When asked how long the drums and boxes remain in the area, Mr. Berteotti stated that the 55-gallon drums and cardboard boxes usually stay in this secondary storage area for "a month or so" before being relocated to a third area known as the less than 90-day storage area located in the basement of Building #6. At the time of inspection, nine (9) 55-gallon drums containing spent coolant and alcohol (F001) from the machining and grinding operation were labeled as hazardous waste, three (3) 55-gallon drums containing waste oils were labeled as non-hazardous waste, and the two (2) large cardboard boxes containing spent cyanide filter cartridges (D003) were labeled as hazardous waste. None of the containers had an accumulation start date at the time of the inspection.

- There is a small workshop at one end of Building #1. At the time of inspection, there were approximately 20 spent, 6 ft fluorescent light bulbs duct taped together and leaning against the wall in a corner. (See Photo # 5) The light bulbs were not in any type of container to prevent breakage, were not labeled, and did not have an accumulation start date.
- Photo #6 shows the satellite accumulation area for spent filter cartridges located in Building #4 before they are moved to Building #1, and then eventually to the less than 90-day hazardous waste area in the basement of Building #6.
- In Building #4, gold and palladium filter cartridges (D003) from the electroplating line are recycled along a back wall within the room, see the yellow and red catchment sinks in Photo #8. A small closet type of room within Building #4, see Photo #7, is used as a satellite accumulation area for the gold and palladium material collected from the filters (F009). Just outside of the satellite accumulation room door were two (2) full, 55 gallon, blue, plastic drums containing gold and palladium cyanide stripper solution and solids that originated from the electroplating line. Mr. Berteotti stated that these drums were considered to be a second less than 90-day hazardous waste storage area that is separate from the basement of building #6. The drums were labeled, but did not have an accumulation start date, see picture #9).
- In the basement of Building #6 is a less than 90-day hazardous waste accumulation area. At the time of inspection, there were 24 full, plastic (blue & black) 55 gallon drums (see photos #10 and #11. Five of the drums were labeled non-hazardous waste, while the remaining 19 drums were labeled having hazardous wastes as they contained spent sulfuric acid, spent hydrochloric acid, and spent cyanide (F006) all coming from the electroplating process line. Of the 19 plastic drums labeled hazardous waste, 10 of the hazardous waste drums containing spent sulfuric acid, spent hydrochloric acid, and spent cyanide (F006) did not have an accumulation start date. When asked if he knew how long the drums at been in the less than 90 day area, Mr. Berteolli said "he was not sure, but felt that they hadn't been there long".
- Approximately 20 feet from the less than 90-day hazardous waste area is a short wall about 3-foot high that separates the room. On the opposite side of this wall, this inspector noted a black, metal 55 gallon drum that was full of plating slurry (F006) from the electroplating line and labeled as a hazardous waste. The drum of plating slurry did not have a start accumulation date, see photo #12)
- About 15 feet away from the black, metal drum was an orange cardboard box that contained spent filter cake (D003). The filter cake is the remaining solids left over from the recycling of the precious metals involved in electroplating. This box was also on the opposite side of the partition wall from the designated less than 90-day hazardous waste

months. None of the boxes of spent light bulbs were labeled or contained an accumulation start date.

- This EPA inspector noticed 7 discrepancies when reviewing the less than 90-day hazardous waste area weekly inspection sheets. The dates below show inspection dates and the length of time between certain dates. The days between inspections exceeds the weekly inspection requirement.

Date Range	Days between inspection
3/12/13 – 4/3/13	22 days
10/3/13 – 10/23/13	19 days
1/14/14 – 2/4/14	20 days
2/4/14 – 2/26/14	21 days
4/8/14 – 6/11/14	32 days
7/22/14 – 8/8/14	16 days
8/8/14 – 9/15/14	36 days

- All photographs were taken by this inspector using a Nikon Coolpix P4 camera.

Inspection Photo Log

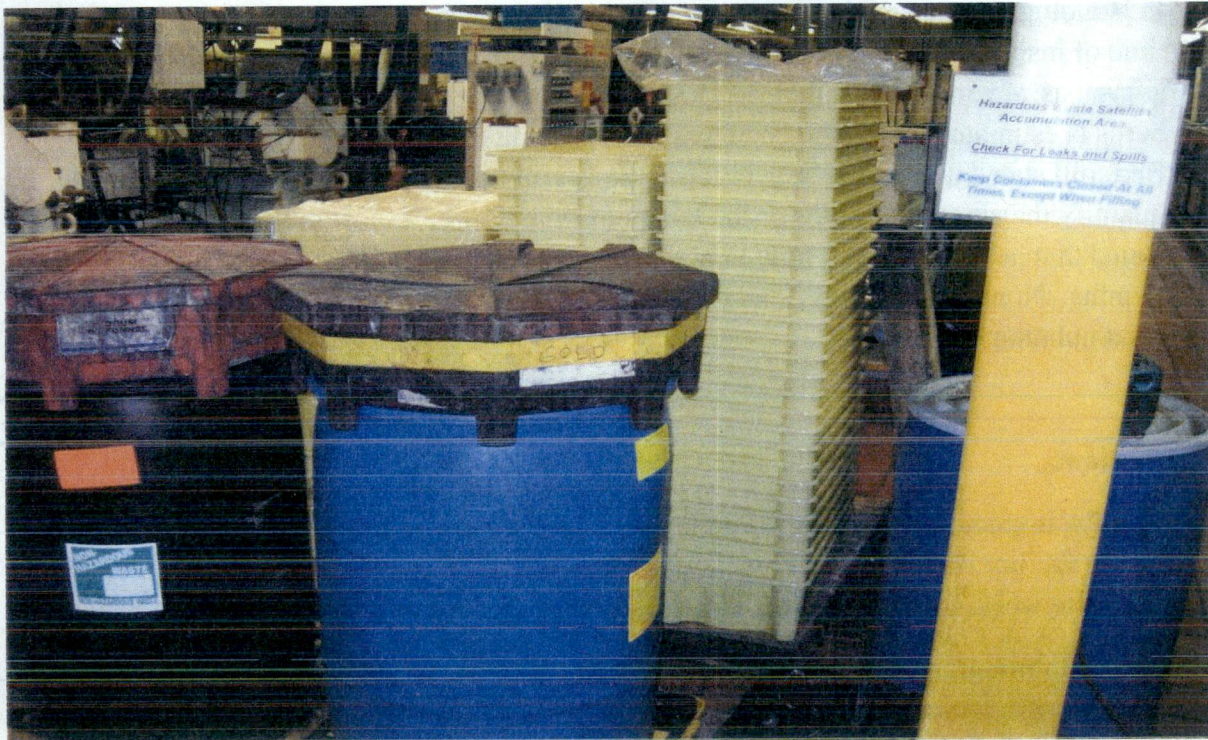


Photo 1 - Designated satellite accumulation area - tool and die manufacturing.



Photo 2 - Spent coolants and waste oils moved from designated SAA area to this location.

area. The box was labeled as a hazardous waste, and was dated at the time of inspection. (See photo #13)

- In Building #1, the area is designated as the Universal Waste accumulation area. At the time of inspection, there were two large wooden boxes (3ft x 6ft) full of spent light bulbs, as well as, several open and taped closed boxes of spent light bulbs. The total number of bulbs is estimated to be 200. When asked how long the bulbs have been there, Mr. Berteolli stated he was not sure because the Facility has no tracking system in place to quantify the amount of bulbs or the length of time they have accumulated. Mr. Berteolli stated that he is not sure of how long they have been there, but it has been at least several months. None of the boxes of spent light bulbs were labeled or contained an accumulation start date.

Records review:

The EPA inspector reviewed the Facility's past two Biennial Reports, three years of manifests, the facility Preparedness Prevention Control (PPC) Plan, employee training records, hazardous waste weekly inspection records, and Emergency Procedures and Response Plan.

After a thorough review of the afore mentioned records, this inspector found problems associated only with the less than 90 day hazardous waste storage area weekly inspections. The other records reviewed showed no problems.

This EPA inspector noticed 7 discrepancies when reviewing the less than 90- day hazardous waste area weekly inspection sheets. The dates below show inspection dates and the length of time between certain dates.

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8/8/14 – 9/15/14	36 days



Photo 3 - Spent coolants and waste oils from tool and die process SAA area relocated to this place.



Photo 4 - Spent filter cartridges from Bldg #4 relocated to holding area where production line once stood.

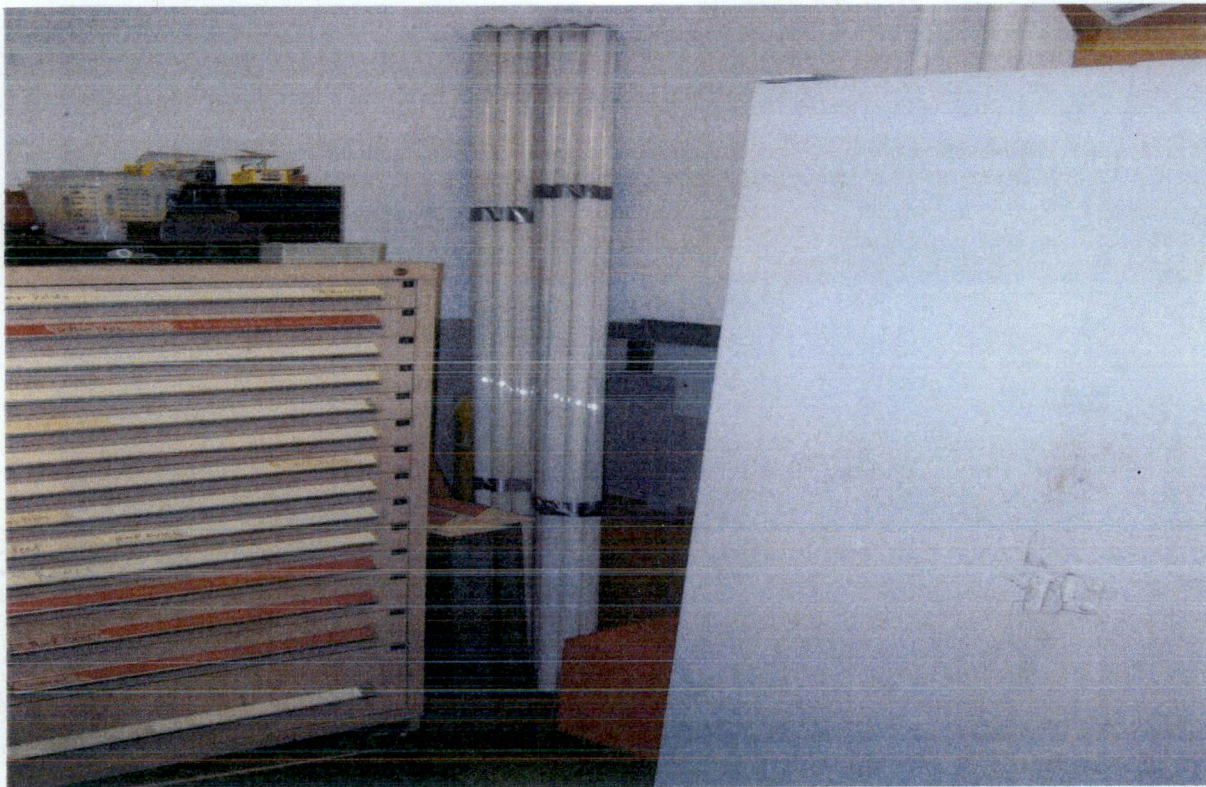


Photo 5 - Spent fluorescent bulbs w/o proper containment or labeling.

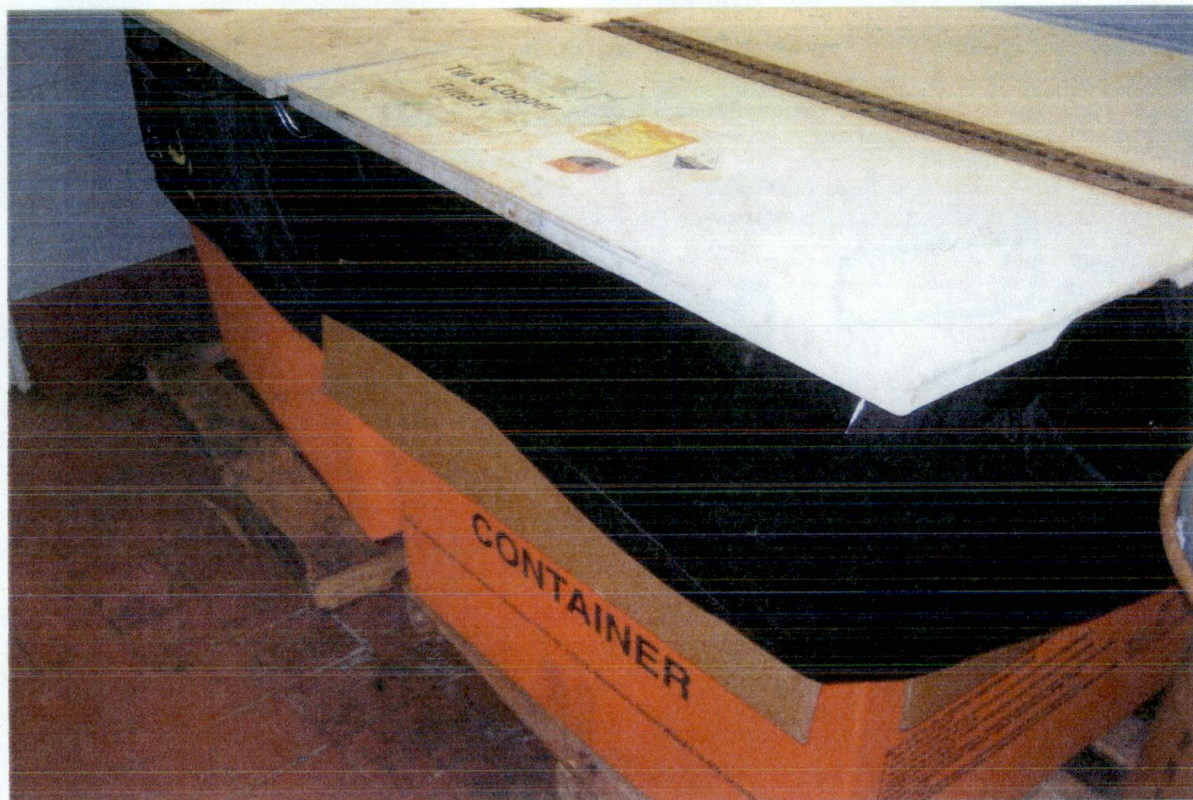


Photo 6 - Spent filter cartridge collection containers in Building #4.



Photo 7- Cyanide Room hazardous waste satellite accumulation storage area.



Photo 8- Cyanide Room less than 90 day hazardous waste accumulation area.

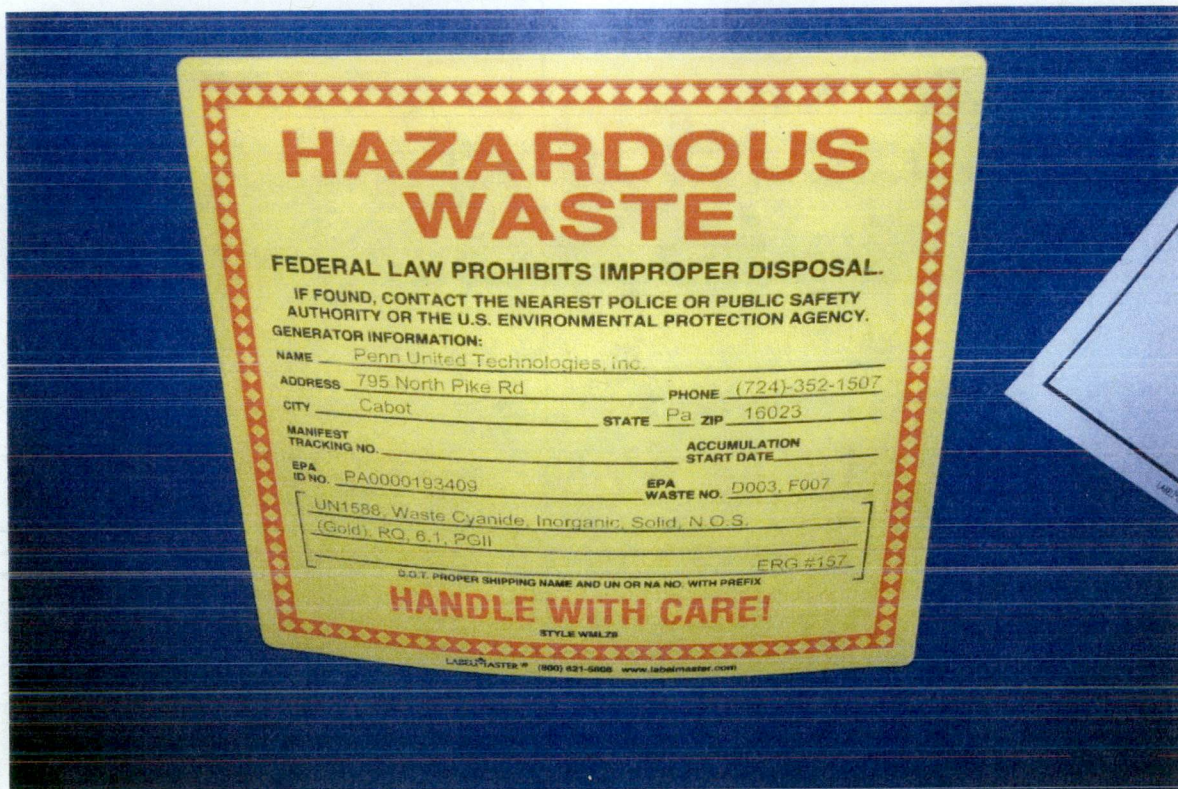


Photo 9 - Cyanide Room less than 90 day storage area drum w/o date.



Photo 10 - Building #6 less than 90 day hazardous waste storage area.



Photo 11- Building #6 less than 90 day hazardous waste accumulation area continued.



Photo 12- Full, metal drum labeled hazardous waste w/o start date.



Photo 13 - Full box of spent filter cartridges labeled hazardous waste..



Photo 14 - Spent fluorescent light bulbs unboxed and unlabeled.

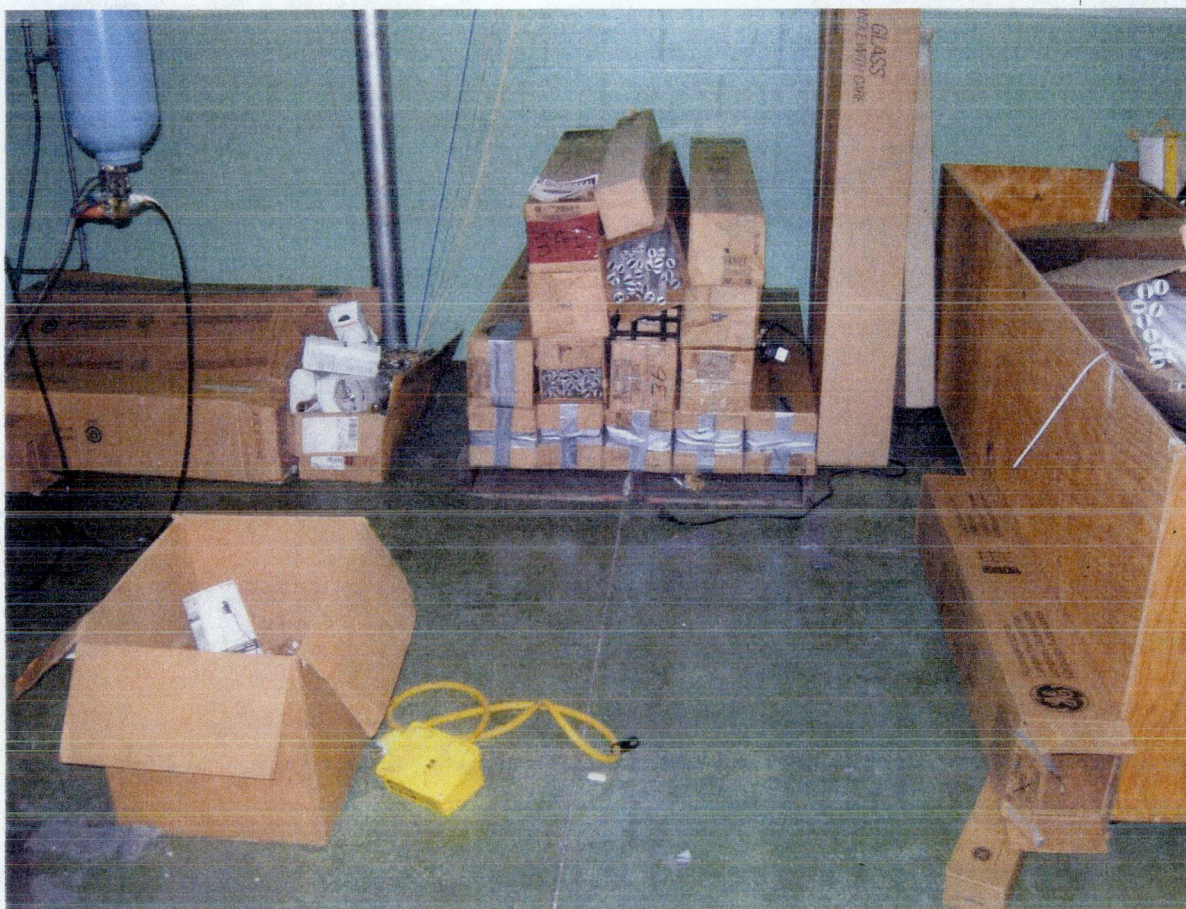


Photo 15- Spent fluorescent light bulbs. Universal waste.

PPC PLAN

PREPAREDNESS, PREVENTION AND CONTINGENCY PLAN

PENN UNITED TECHNOLOGIES

**795 North Pike Road
Cabot, PA 16023**

Jefferson Township

OCTOBER 2013

NOTE

This PPC Plan covers all elements of the following
State and Federal Pollution Incident Prevention and
Emergency Response Requirements as outlined below

Plan	Implemented By	State and Federal Laws Which Apply	State and Implementing Regulations	Effective Date of Regulations
Spill Prevention Control and Countermeasure (SPCC)	U.S. EPA*	Federal Clean Water Act	40 CFR 112	1973
Preparedness, Prevention, and Contingency (PPC), or Contingency Planning	Pa. DEP as part of the Hazardous Waste Program	Pa. Solid Waste Management Act	25 Pa. Code Ch. 262a, 264a, 265a, 266a	5/01/99
	Pa. DEP as part of the Residual Waste Program	Pa. Solid Waste Management Act	25 Pa. Code Ch. 287, 288, 289, 293, 295 and 297	7/4/92
	Pa. DEP as part of the Water Quality Program.	PA Clean Streams Law	25 PA Code Chapter 91.34	1971
Facility Response Plan (FRP)	US EPA*	US Coast Guard	Oil Pollution Act 40 CFR 112 (OPA)	1990

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A. DESCRIPTION OF FACILITY

1. Description of Industrial Activity

Penn United Technologies is an integrated business including tool and die manufacturing and repair, metal stamping, precision assembly and electroplating. We employ approximately 520 people. The facility operates 24/5 and may schedule to operate on Saturday. These activities are housed in multiple buildings as identified below.

Tool and Die Manufacturing Building #1, #6

Precision tool and die components are manufactured from various steel products by machining and grinding operations. These are used internally and sold to customers. Waste includes aqueous coolants and trash. Metal is recycled.

Stamping Buildings #1 and #2

Metal is formed into numerous components of varying size and shape with mechanical power presses. These are used as components in the electronics industry, telecommunications, medical, tool assembly, etc. industries. Waste includes used lubricating oil, oil adsorbents and trash. Metal is recycled.

Electroplating Building #4

Metal components manufactured at Penn United or received from customers are electroplated with metals including nickel, tin, tin-lead, gold, silver and palladium. Waste includes electroplating rinse (D002, D008), electroplating sludge (F006), trash, gold cyanide stripper solution and solids (D003, F009) and gold and palladium filter cartridges (D003). Metal and non-precious metal filter cartridges are recycled or used as an ingredient.

Precision Assembly Building #6

Penn United manufactures various electronic components and tools, which are assembled by both hand and machine. Waste includes trash.

Warehousing Building #2

Materials used throughout the different manufacturing locations are stored in a common warehouse. Materials are inventoried on steel racks. No waste generated.

Second Operations Building #2

Metal components used predominantly in the medical industry are cleaned and packaged for shipment to customers that assemble medical devices. Waste includes trichloroethylene (F001) and an oily waste water.

No # 5, 8, 9 sold
#7 carbide

Maintenance is housed in one location, but services all operating areas of the facility and provides all routine maintenance functions. Waste includes parts cleaning solution (F006, D039), fluorescent light bulbs (Universal) and trash.

2. Emergency Response Plans

Penn United Technologies has prepared and implemented an Emergency Action Plan. This plan addresses response to fire, hazardous chemical release, natural disaster, toxic gas release or civil disorder. This plan includes emergency reporting, roles and responsibilities, training, emergency contacts, communication, employee accountability, available emergency equipment and specific response actions. This plan is incorporated by reference and a copy attached in Appendix III.

3. Material and Waste Inventory

Material Description	Bldg No.	Status	Avg. Qty.	Storage Container
Trichloroethylene	#2	M / W,R (F001)	7drums	55-gallon Steel Drums
Oily water	#2 basement	W	1575 gallons	2100-gallon polypropylene tank
Lubricating Oils	#1, #2, #4, #6	M	18 drums	55-gallon steel drums
Waste Oil	#1, #6	W	2 Totes	250 / 500 gallon poly tote
Alcohol	#1, #2, #6	M	8 drums	55-gallon steel drum
Coolant	#1, #6	M	6 drums	55-gallon steel drums
Spent Coolant	#1, #6	W	2 totes	250 gallon totes
Sulfuric Acid	#4	M	3 drums	55-gallon poly drums
Hydrochloric Acid	#4	M	2 drums	55-gallon poly drums
Diesel Fuel	At generator	M, Fuel	2000 gallons	STP II tank, double wall
Coolant Tank	#6	M	650 gallons	1000 gallon Polypropylene tank
Plating rinse solution	#4	W (D002, D008)	6500 gallons	Polypropylene tanks (2) 4000 gallon, (1) 2500 gallon
Gold / Silver cyanide stripper and filter cartridges	#4	W, R (D003, D008, F009)	5 drums	55 gallon poly drums
Solid cyanide mixture	#4	W, R (D003, D008, F009)	1 drum	Steel drum
Cyanide sludge	#4	W (F006)	0 drum	
Spent filter cartridge	#4	Ingredient	2 boxes	Double-lined fiberboard box
Universal Waste - Lamps	#1	W	2 boxes	Wooden crates
Universal Waste – Lead Acid Batteries	#10	R	20 various sizes	On wood pallet

Purchased Material – M Waste – W Reclaimed - R

A master list of all products in inventory at Penn United Technologies is located in Appendix II.

Waste Storage: Basement of Bldg 6, 90 day accumulation
Warehouse area Bld 2, 90 day accumulation

Satellite Storage: In between plating lines (two locations)
Filters next to chemical storage room
Trichloroethylene in SOP cleaning area

5. Pollution Incident History

There have been no significant spills or releases of hazardous or residual materials or wastes at this facility.

Date	Event	Material	Amount	Corrective Action
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6. Implementation Schedule for Plan Elements not Currently in Place

Subject	Implementation Date
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B. DESCRIPTION OF HOW PLAN IS IMPLEMENTED BY ORGANIZATION

1. Organizational Structure of Facility for Implementation

The Process Engineer in the Human Resources Department is responsible for reviewing, maintaining and implementation of the PPC Plan with the assistance of representatives from other facility locations. The plan will be reviewed periodically and updates made in accordance with 40 CFR 265.54. If the plan fails in an emergency it will be reviewed promptly and revised to meet the facilities needs. Each person listed and an emergency coordinator will be thoroughly familiar with the information in this plan and its execution. Each of the coordinators has a copy of the plan.

2. Emergency Coordinators

Primary Coordinator Paul Bergbigler, Plating Manager

Home: 270 Game Lands Road
Butler, PA 16002
(724) 283-7266
cell (724) 968-6617

Work: Building #4
(724) 352-1507 ext. 4701

Secondary Coordinator Rege Weleski, Plating Coordinator

Home:

Work: Building #4
(724) 352-1507 ext. 4703

Secondary Coordinator

Kevin Kroneberg, Maintenance Group Manager

Home: 641 North Pike Rd
Cabot, PA 16023
(724) 321-4328

Work: Building #3
(724) 352-1507 ext. 4654
cell (724) 321-4328

Secondary Coordinator

Steve Berteotti, EHS Manager

Home: 257 Medical Center Rd
Chicora, PA 16025
(724) 445-2179

Work: Building #9
(724) 352-1507 ext. 4610
cell (724) 355-8516

2. Duties and Responsibilities of the Emergency Coordinator

If an emergency response were initiated due to a release of a material or waste identified by this plan the Emergency Coordinator would perform the following duties:

- A. Asses the emergency to determine all health or environmental hazards and the level of response required abating the situation.
- B. Ensure that alarms and communication systems have been activated and all facility personnel have been notified.
- C. Activate the Incident Command System and Penn United Emergency Response Team
- D. Determine if a facility evacuation is required
- E. Monitor the emergency to determine if outside response contractors are needed.
- F. Insure appropriate emergency response agencies, local authorities and the PA DEP as required are notified. The notification will include the following items. Do not speculate if you do not have actual information.
 - i. Name of person reporting the incident
 - ii. Name and location of the facility
 - iii. Telephone number where coordinator can be reached
 - iv. Date, time and location of the incident
 - v. Description of the incident and assessment of hazards
 - vi. Type and quantity of the material released

vii. Extent of contamination and response activities

- F. Initiate record keeping for timeline of events.
- G. Assess the potential for any leaks or spills that could result from the incident
- H. Supervise remediation activities protecting human health and the environment
- I. Submit a written report to the PA DEP within 15 days of the incident

Following remediation of a spill or release the Environmental Coordinator shall ensure that any waste material generated during the emergency is properly contained and stored on site and promptly initiate action for treatment and disposal. The Emergency Coordinator must ensure that all equipment used during the response is decontaminated, restocked and consumables replaced so all equipment and supplies are available for future use.

The Secondary Coordinator supports or fills in for the Primary Coordinator.

3. Chain of Command

In the event of an emergency release notification must be made to the following

Title	Name	Office ext	Phone Number
President	Bill Jones	4538	Home (724) 352-1366 Cell (724) 321-4415
HR Manager	Jim McKain	4727	Home (724) 445-6417 Cell: (724) 496-7959
Group Production Mgr	Jim Mahan	6543	Home: Cell: (724) 766-6320
VP Manufacturing	Barry Barton	6509	Home (724) 297-5213 Cell (724) 321-4338
EHS Manager	Steve Berteotti	4610	Home (724) 445-2179 Cell: (724) 355-8516
The following based on area of release			
Plating Manager	Paul Bergbigler	4701	Home (724) 283-7266 Cell (724) 968-6617
Plating Coordinator	Rege Weleski	4703	Home
Maintenance Manager	Kevin Kroneberg	4654	Cell (724) 321-4328

C. Spill Leak Prevention and Response

1. Pre-release Planning

The primary sources of possible pollutants (including wastes) are listed below with the pollution incident prevention practices also indicated.

i) Above Ground Storage Tanks (AST)

There are six (6) above ground storage tanks as shown on Figure 1 and defined below.

Number	Location	Capacity	Content	Dike Volume	Status
Tank 21	Building #2	2100 gallons	oily water	2400 gallons	non-hazardous
out — Tank 03	Generator	2000 gallons	Diesel Fuel	Double wall	non-hazardous
Tank 64	Building #6	1000 gallons	PE Glycol	1125 gallons	non-hazardous
equalizer — Tank 45	Building #4	4000 gallons	Plating Rinse	28,000 gals.	Hazardous
large — Tank 46	Building #4	4000 gallons	Plating Rinse	28,000 gals	Hazardous
small — Tank 47	Building #4	2500 gallons	Plating Rinse	28,000 gals	Hazardous

4000 gallon treatment tank
The following preventive steps have been taken to mitigate a release for various tanks

- An impervious pad with secondary containment capable of holding 110% of the tank volume
- Overfill protection and containment
- Tanks are checked for capacity before making an addition
- Labeling indicating tank contents, health and safety warnings and NO-Smoking as appropriate
- Fire Extinguisher located within 75 feet
- Visual inspection of tanks, transfer lines and loading areas
- Liquid level detectors
- Release of material alarms, fixed and remote.
- Capacity verification before transfer
- Adsorbent materials readily available

ii). All Manufacturing Areas

- Located indoors and on concrete floors
- No floor drains
- Area occupied 24/5
- All spills receive prompt attention
- Fire extinguisher located within 75 feet
- Visual inspection of operating equipment and drums
- Equipment on PM schedule
- All buildings secured

2. Material Compatibility

All environmentally sensitive material or waste is stored in compatible containers or tanks. All AST's are dedicated to single material use. Compatible materials may be mixed prior to disposal.

3. Inspection and Monitoring Program

On a daily basis (M-F) the following storage location(s) are visually inspected for any problems and gauged for available capacity. Any unusual conditions shall be reported to the plating manager, plating coordinator or process engineer:

- Hazardous waste storage tanks building #4

On a weekly basis the following storage location(s) are visually inspected for any problems. Any unusual conditions shall be reported to the plating manager, plating coordinator or process engineer:

- Waste water storage tanks building #2
- Cyanide solution drum storage building #4 ✕
- Trichloroethylene drum storage building #2

Example forms are included in Appendix I

4. Preventive Maintenance

The maintenance manager directs preventative maintenance. Stamping presses, transfer equipment, are routinely inspected prior to use. Any worn or leaking components are replaced prior to use. Pumps and hoses are routinely inspected and replaced as needed. Containers are routinely examined before use and replaced if they are unsuitable.

5. Housekeeping

Penn United Technologies has to operate its manufacturing in a clean and well organized manner to maintain the quality of its product lines.

- Purchased, used, scrap and waste materials are stored throughout the facility in labeled containers and are kept away from traveled walkways and vehicles to prevent run-in damage. Materials are stored in a neat and orderly fashion.
- All spills are quickly contained and cleaned up with adsorbent material (pads, loose adsorbent, socks) then collected in approved waste containers for disposal.
- Trash receptacles are placed throughout the facility and emptied regularly into dumpsters that are picked up weekly.
- Scrap metal is collected in steel bins, heavy walled fiberboard boxes or roll-off containers depending upon the type and volume. These are accumulated until sufficient volume warrants it being recycled by an outside vendor.
- Work stations are kept in a clean, orderly condition that helps in preventing unwanted spills

6. Security

All hazardous waste and material are secured by restricted access to authorized personnel only. All doors are locked and controlled by a bar code photo ID tag issued to employees. Visitor access to the plant is limited to the hours between 7:00 AM and 5:00 PM and Penn United employees must escort them after they sign in. During non-working hours an alarm system is activated to deter unauthorized visitors.

The two tanks located outdoors have only one location each that has the potential for an unauthorized person to drain contents. The valve and spout of each has been locked closed to prevent tampering.

Exterior facility lighting is controlled with a dusk to dawn feature to dissuade unauthorized visitors.

7. External Factor Planning

Manufacturing operations at Penn United Technologies are conducted in a manner that limits the amount of potentially hazardous materials utilized in manufacturing or produced as waste.

The only external factors that could have a serious impact on the safety and health of the public or the environment would be a fire or tornado. In the event of a fire, the Emergency Response Plan will be activated for an employee evacuation and contact 911 to obtain outside firefighting assistance. In the event of a tornado, the Emergency Response Plan would be activated for a non-evacuation. Indoor facility locations have been designated for personnel to assemble. Because the majority of materials are stored indoors the environmental impact from a tornado is deemed to be minimal.

The facility is located away from a flood plain and is sufficiently removed from Route 356 (also known as North Pike Road) to preclude any damage from automobile accidents. Two different public utilities provide electric service to the facility minimizing the risk of power outage. A backup generator is in place and will maintain critical operations in the event of a power outage. It is thought to be unlikely that natural disasters will create the potential for the environmental impact from the accidental release of hazardous substances.

The labor force at Penn United Technologies is not unionized. However, in the event of a strike, security personnel will be hired to prevent unauthorized entry to the facility.

8. Employee Training

The following training is provided to the appropriate employees.

HAZWOPER OSHA 29 CFR 1910.120

Awareness Level. Certain employees that work with or in the vicinity of hazardous materials or waste who are likely to witness or discover a release receive training on identifying, reporting and hazards of hazardous materials in their work area .

Technician Level. Certain employees that work with or in the vicinity of hazardous materials or waste and designated maintenance employees receive training to identify, report and respond to control, abate and remediate the release of a hazardous material or waste.

Incident Command Level. Certain designated employees that are trained to identify, report, respond and direct a response to a hazardous material or waste release by implementing the ICS.

Right-To-Know OSHA 29 CFR 1910.1200

All facility employees receive training on how to identify hazardous materials used in our facility, the health and physical hazards from exposure and the handling precautions required. Training covers topics such as how to use a MSDS, selection and use of PPE, routes of entry, exposure symptoms, proper storage and first aid.

PPC Training

Training of all employees is documented and retained for 3 years on the aspects and requirements outlined in our PPC Plan.

Emergency Action Plan

All new employees receive training on Penn United's EAP; incident reporting, when and how to activate the plan, evacuation routes and areas of refuge. Retraining is provided by area Team Leaders when employees transfer into their department.

D. COUNTERMEASURES

1. Facility Countermeasures

In the event of a spill or major leak of an environmentally sensitive material, the first priority is to attempt to stop the cause of the spill/release. This must be done using the proper precautions and appropriate personal protective equipment. If the material is unknown, attempt to identify the material by labels, placards, other markings, etc.

Once the material is identified, appropriate measures must be implemented (with proper protection for employees) to stop the spread of the spill and to prevent it from entering any drains or waterways. Use spill kits (pads, socks, pillows, blankets, and loose absorbent) to control smaller spills. Place absorbent materials in a fashion that will prevent the material from migrating further. In the event of a large spill, use of equipment, shovels, and other appropriate tools to move sand, soil or other material to construct a dike/containment structure will help to collect the material and prevent further spread or flow into any drainage system. If a material spills near a drain/inlet, use drain stopper mats to prevent the material from entering the drain/inlet.

If a release occurs onto the floor in a manufacturing area, ensure that all overhead doors and doorways are closed. Place cones outside of these openings to ensure they are not opened from outside. Contain the spill with booms, loose adsorbents or rags. Recover as much liquid as possible and clean up the balance with adsorbent materials.

If material gets into a waterway, prevent the material from getting further downstream by placing booms across the entire width of the waterway (at a point downstream from the spilled material),

preferably at a narrow point. Use absorbent pads to absorb material that may be floating on the surface of the water.

If material spills in an area with secondary containment, ensure valves are closed on the containment structure and collect the bulk of the spilled material and remove the balance with absorbents. Once the material has been absorbed, collect used absorbents (pads, pillows, socks, blanket, etc.) in an approved 55-gallon drum for appropriate waste inventory and proper disposal.

After a spill has been contained and the immediate emergency has subsided, cleanup of the spill material should be initiated. Use shovels or equipment, as necessary, to complete cleanup. If material has spilled on soil, remove any stained soil. Use of proper personal protective equipment, such as protective suits, gloves, safety glasses, coveralls, etc., must be worn to protect the employee. Decontamination of equipment must be completed after remediation and materials such as absorbent materials must be restocked.

2. Contractor Countermeasures

Contractors will be employed to assist in a large control or clean-up incident. Their primary role is providing equipment to recover larger quantities of liquids, assist in removal of contaminated soil and debris and support in the control and recovery of material that has flowed off of the property.

3. Internal and External Communications

The facility is equipped with an intercom system in all buildings. In the event of an incident, the emergency response coordinator will advise personnel of the nature of the emergency and the appropriate action to be taken.

Telephone communication will be used to summon outside assistance in the event of an emergency. Dialing instructions for the local fire company and ambulance are posted beside plant telephones. Several members of management also have cellular telephones in the event of landline failure or remote communication is required.

4. Evacuation Plan

Evacuation will be initiated via the plant intercom system in accordance with Penn United Technologies' Emergency Action Plan. Primary and secondary evacuation routes are shown on the egress maps.

5. Emergency Equipment

On-site emergency equipment includes:

- 110 Fire extinguishers
- 12 Eye wash stations
- 6 Safety Showers
- 12 First aid kits

- 12 First Responder Kits
- Absorbent materials
- Mops, buckets, brooms, shovels
- 3 Emergency air supply respirators
- 9 Automatic External Defibrillators (AED)
- Public address communication system and alarms
- Back-up generators

The location of the emergency equipment is shown on the floor plan.

E. Emergency Spill Control Network

1. Arrangements with Local Emergency Response Agencies

Emergency Dispatch	McCutcheon Enterprises 250 Park Road Apollo, PA 15613 (724) 568-3623	24 hour service
	Dick McCall, Inc Petrolia Street Petrolia, PA 16050 (724) 756- 6840	Bob Shirey (724) 756-1621
	Clean Harbors 2900 Broadway Cleveland, OH (216) 429-2401	

2. Emergency Contacts and Telephone Numbers

<u>Ambulance:</u>	Dispatched through Butler County Communications (911)
	Saxonburg VFD Emergency Ambulance Service (724) 352-3500
<u>Hospitals:</u>	Allegheny Valley Hospital 1301 Carlisle Street Natrona Heights, PA 15065 (724) 224-5100

Butler Memorial Hospital
911 East Brady Street
Butler, PA 16001
(724) 284-4545 (Emergency Department)

Allegheny General Hospital
320 East North Avenue
Pittsburgh, PA 15212
(412) 359-3252 (Emergency Department)

Poison Center (800) 222-1222

National Response Center (800) 424-8802

Federal Level: EPA- Region III
(800) 424-9346

State Level: Pennsylvania Department of Transportation
(800) 426-9281 (717) 787-2838

Department of Environmental Protection
Bureau of Solid Waste Management
121 N Mill Street
New Castle, PA 16101
(724) 656-3160

Emergency 24 hrs: (800) 373-3398
Meadville Office: (814) 332-6945

Contact: Dennise Campbell
Solid Waste Specialist
New Castel Office

Contact: Rick Gilson
Water Quality Protection (Meadville)
(814) 332-6942

PEMA (717) 651-2001

Local Level: Saxonburg Volunteer Fire Company
Saxonburg Boulevard
Saxonburg, PA 16056
(724) 352-3430 360-3300
cc: Ambulance Division

Contact: Gary Cooper
Fire Chief

911 Center Butler County Emergency
Police Management Center
Fire 703 Morton Avenue
Ambulance Butler, PA 16001

Non- Emergency #: (724) 287-7769

Contact: Emergency Management Coordinator
Butler County Communication Director

APPENDIX I

Daily Rinse Water Storage Inspection Log

HAZARDOUS Bldg #4

[illegible]

WEEKLY HAZARDOUS MATERIAL / WASTE INSPECTION LOG

Date:		Inspector:			
	Container		Containers Leaking	Containers Closed	Comments
Location	Description	Contents	Y / N	Y / N	
Rec. Dock					

Shop Floor					
Gold Stripper					
()					

Storage					
Spent Filters					
Box 1					
Box 2					
Box 3					
Gold soln.					
()					

Caustic Rm					
()					
Acid Rm					
()					
Chemical Rm					
()					

() include the number of drums stored and inspected

APPENDIX II

List of MSDS of Hazardous Materials is maintained in the HR Corporate Office

APPENDIX III

Emergency Action Plan

APPENDIX IV

HAZWOPER Response Plan

FIGURE 1

Map Location of Aboveground Storage Tanks

Penn United Technologies, Inc.
Hazardous Waste Daily Inspection

DATE	Volume					Visual			
	LT2 Volume	T-2 Volume	T-30 Volume	T-20 Volume	Evap. Slurry Holding Tank	Filtrate	CIP	T-70	Evap. Slurry Metal Tank
8-5-14	329	2442	0	500	750	OK	OK	OK	OK
8-6-14	329	1503	1700	0	950	OK	OK	OK	OK
8-7-14	415	1113	1000	200	950	OK	OK	OK	OK
8-8-14	412	967	0	2000	950	OK	OK	OK	OK
8-11-14	415	2147	0	0	1250	OK	OK	OK	OK
8-12-14	415	1061	0	1700	1250	OK	OK	OK	OK
8-13-14	415	1536	0	500	1250	OK	OK	OK	OK
8-14-14	412	3101	0	0	1250	OK	OK	OK	OK
8-15-14	415	2106	0	300	1250	OK	OK	OK	OK
8-18-14	811	2731	0	0	1250	OK	OK	OK	OK
8-19-14	947	2371	0	200	1600	OK	OK	OK	OK
8-20-14	785	1579	0	400	1600	OK	OK	OK	OK
8-21-14	785	2943	0	0	1600	OK	OK	OK	OK
8-22-14	644	1787	0	2000	1600	OK	OK	OK	OK
8-25-14	644	3158	0	0	0	OK	OK	OK	OK
8-26-14	644	1448	0	700	0	OK	OK	OK	OK
8-27-14	644	2542	0	100	0	OK	OK	OK	OK
8-28-14	1007	1724	0	500	0	OK	OK	OK	OK
8-29-14	1004	2030	0	200	0	OK	OK	OK	OK
9-2-14	2564 859	2506	0	200	0	OK	OK	OK	OK
9-3-14	761	1593	0	700	0	OK	OK	OK	OK
9-4-14	761	2319	0	250	350	OK	OK	OK	OK
9-5-14	761	3232	0	0	350	OK	OK	OK	OK
9-8-14	1467	3386	0	0	950	OK	OK	OK	OK
9-10-14	1467	2394	0	200	850	OK	OK	OK	OK
9-10-14	1467	3379	0	0	850	OK	OK	OK	OK
9-11-14	3741 1799	2705	0	100	850	OK	OK	OK	OK
9-12-14	1794	2040	1700	0	850	OK	OK	OK	OK
9-15-14	1794	2462	0	0	1300	OK	OK	OK	OK

724 302 7847

Hazarene wash tanks (big tanks)
bld. #4 basement

Penn United Technologies, Inc.
Hazardous Waste Daily Inspection

[illegible]



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
REGION III
1650 Arch Street
Philadelphia, Pennsylvania 19103-2029

VIA UPS

Mr. Steve Berteotti
Environmental Health & Safety Manager
Penn United Technologies, Inc.
799 North Pike Road
Cabot, Pennsylvania 16023

Re: Request for Information Pursuant to Section 3007(a) of the Resource Conservation and Recovery Act, 42 U.S.C. § 6927(a), Regarding Generation and Management of Hazardous Waste by Penn United Technologies, Inc. EPA ID No. PA0000193409.

Information Request – Reference No. C15-025

Dear Mr. Berteotti,

The U.S. Environmental Protection Agency, Region III ("EPA") is requesting additional information to supplement the information obtained by the EPA during the August 27, 2014 Compliance Evaluation Inspection ("CEI" or "August Inspection") of Penn United Technologies, Inc. ("Penn United" or "the Facility") located at 799 North Pike Road in Cabot, Pennsylvania. EPA is requesting this information pursuant to the authority granted to it under Section 3007(a) of the Resource Conservation and Recovery Act ("RCRA"), 42 U.S.C. § 6927(a), which provides in relevant part that "any person who generates, stores, treats, transports, disposes of, or otherwise handles or has handled hazardous wastes shall, upon request of any officer, employee, or representative of the Environmental Protection Agency, duly designated by the Administrator, . . . furnish information relating to such wastes . . ." EPA hereby requires that you furnish to the EPA, **within thirty (30) calendar days** of receipt of this letter, the information requested below, including all documents responsive to such request.

For each and every request, if you have any reason to believe that there is a person(s) who may be able to provide a more detailed or complete response to such request or may be able to provide additional responsive documents, then as a part of your response to such request,



identify each such person and the additional information or documents which such person may be able to provide. Furthermore, for each and every response, if information or documents responsive to such request are not in your possession, custody or control, then as part of your response to such request, identify each person from whom such information or documents may be obtained.

Please provide a separate narrative response to each question. Precede each answer with the number of the question and letter of the subpart of the question to which it corresponds. A request for documents shall be construed as a request for any and all documents maintained by you or in your custody, control, or possession or in the possession, custody or control of any of your employees or agents, relating to the matters described below. For each copy of a document produced in response to this request, indicate on such copy, or in some other reasonable manner, the number of the request to which it responds, the current location and custodian of the original, the date such original was prepared, the persons(s) who prepared the original and the date the document became effective at the Facility.

As used herein, the term "document" means: writings (handwritten, typed, or otherwise produced or reproduced) and includes, but is not limited to, any invoices, checks, receipts, bills of lading, weight receipts, toll receipts, correspondence, offers, contracts, agreements, deeds, leases, manifests, licenses, permits, bids, proposals, policies of insurance, logs, books of original entry, minutes of meetings, memoranda, notes, calendar or daily entries, agendas, bulletins, notices, announcements, charts, maps, photographs, drawings, manuals, brochures, reports of scientific study or investigation, schedules, price lists, telegrams, teletypes, phonograph records, magnetic voice or video records, tapes, summaries, magnetic tapes, punch cards, recordings, discs, computer print outs, or other data compilations from which information can be obtained or translated.

All other terms used in this request for information that are defined in RCRA, 42 U.S.C. §§ 6901 *et seq.*, or 40 C.F.R. Parts 260-266 and 268 shall have the meanings set forth therein.

Requested Information

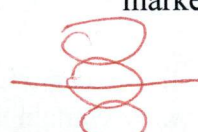
- According to an inspection report documenting EPA's August Inspection, Building #1 of the Facility houses the tool and die manufacturing processes. Waste streams generated in this building include lubricating oils, waste oil, alcohol, coolant, spent coolant, and trash. The building previously contained four production lines until line #3 was removed. At the time of the inspection, a secondary storage area was in use where line #3 used to be. A small workshop at one end of Building #1 was also observed to be an accumulation area for universal waste.
1. Please answer the following questions ~~regarding Building #1~~ in terms of at the time of the inspection. If any changes have occurred since the inspection, please include both responses and a date that reflects when each change occurred.



Should I add this to each building question?

Shipment offsite vs. offsite shipment

- a. Describe each waste stream that is generated in Building #1. Please provide a hazardous waste determination for each of these wastes and any documents used to make the determination.
- b. Please identify each satellite accumulation container present, including what type of waste is stored in each container. Mark the location of each such container on a site layout diagram along with where the corresponding waste is generated.
- c. Describe the flow of the wastes contained in satellite accumulation areas in Building #1 from generation to shipment offsite. Include any secondary storage and time spent at each location leading up to the offsite shipment.
- d. Describe the flow of waste generated in Building #1 that are not contained in satellite accumulation areas from generation to shipment offsite. Include any secondary storage and time spent at each location leading up to the offsite shipment.
- e. What is the exact date that the production line #3 was removed from service?
- f. Why was the production line #3 removed from service?
- g. Please describe the secondary storage area located where production line #3 used to be and how it is used.
- h. How long is waste stored in the secondary area before being moved to the less than 90-day storage area?
- i. Please describe the Facility's process to label and date hazardous waste drums. When are the drums labeled? When is the start accumulation date marked on the drums?



According to the inspection report documenting EPA's August Inspection, Building #2 of the Facility houses a stamping process, secondary operations, and warehousing. Waste streams in this building include trichloroethylene (F001), oily waste water, waste lubricating oil, and trash.

2. Please answer the following questions regarding Building #2 in terms of at the time of the inspection. If any changes have occurred since the inspection, please include both responses and a date reflecting when each change occurred.
 - a. Describe how the trichloroethylene (F001) waste is generated. Provide a detailed process of how, how much, and how often this waste stream is generated.

b. Where is the F001 waste stored? Please describe the flow of this waste from point of generation to shipment offsite, including any satellite containers, all locations in which containers are stored in and the time frame it is stored there.

c. Are there any satellite accumulation areas within Building #2? If so, please identify each container, what type of waste it contains, where it is located, and where its corresponding waste is generated. *use site map if*

d. Please describe the flow of any waste stored in satellite accumulation containers from point of generation to shipment offsite, including all locations in which it is stored and the time frame it is stored there.

e. Describe the Facility's process for labeling and dating hazardous waste drums, including satellite accumulation containers generated within Building #2.

f.

According to the inspection report documenting EPA's August Inspection, Building #3 is used for maintenance purposes. Waste streams in this building include parts cleaning solutions (F006, D039), fluorescent light bulbs, and trash.

3. Please answer the following questions regarding ~~Building #3~~ in terms of at the time of the inspection. If any changes have occurred since the inspection, please include both responses and a date that reflects when each change occurred.

a. Please describe the parts cleaning solutions (F006, D039) generated in this building. Include how much and how often this waste is generated.

b. Provide MSDS sheets for all of the parts cleaning solutions (F006, D039) mentioned in the Facility response to question 3a.

c. Describe the flow of the parts cleaning solutions (F006, D039) from generation to offsite shipment. Include labeling and dating methods for the waste containers, any satellite accumulation containers utilized, and locations the waste is stored along the way including the timeframe it is stored there.

d. Asf

According to the inspection reports documenting EPA's August Inspection, Building #4 houses the Facility's electroplating operations. Various metals including nickel, tin, tin-lead, gold, silver, and palladium are used in the Facility's electroplating operations. Waste streams generated in this building include electroplating rinse (D002, F009), electroplating sludge (F006), gold cyanide stripper solution and solids (D003, F009), and gold and palladium filter cartridges (D003).

4. Please answer the following questions regarding Building #4 in terms of at the time of the inspection. If any changes in those responses have occurred since the inspection, please include both responses and a date that reflects when each change occurred.
- a. Describe where the gold and palladium filter cartridges (D003) are generated.
 - b. Are these filter cartridges sent for disposal or treatment? Please describe what happens to the cartridges once they leave the facility. Provide the name and location of the company/facility that the cartridges are sent to.
 - c. Describe what waste is being stored in the 55-gallon drums shown in Photo #7 of the inspection report and where it was generated.
 - d. Provide a detailed flow from generation to offsite shipment of the waste pictured in Photo #7 of the inspection report, including any satellite accumulation containers, secondary storage areas, and time spent in each location.
 - e. Describe the waste that is being contained in 55-gallon drums as seen in Photo #8 of the inspection report.
 - f. Provide an explanation as to how the Facility knows those two 55-gallon drums were not in that location for longer than 90 days?

GOLD-PALLADIUM filter cartridges – (B4?)

Building #4: Please describe where the gold and palladium filter cartridges (D003) waste is generated. Where is the location of the satellite accumulation containers used to contain this waste? Please describe in detail where the satellite container is taken once it is full and the amount of time spent in each area. Who is the vendor that receive the filter cartridges? Are these cartridges recycled in any way? If so, please describe what part of the waste is recycled.

5. Building #5 is not discussed in the Inspection Report. Please describe what processes occur in this building and what wastes are generated from this process. Are there are wastes stored in this building? Are there any universal wastes stored in this building?
- a. asfd

According to the inspection report documenting EPA's August Inspection, Building #6 houses the tool and die manufacturing and precision assembly processes. Waste streams documented in this building are waste coolants and trash. The basement of Building #6 is where the Facility's designated less than 90 day hazardous waste accumulation area ("HWAA") is located. There were 25 full, 55-gallon drums in this HWAA at the time of the inspection. 5 of these drums were

labeled as non-hazardous waste, and 20 were labeled as hazardous waste. 10 of the 19 hazardous waste drums located in the Building #6 HWAA were not labeled with a start accumulation date

6. Please answer the following questions regarding Building #6 in terms of at the time of the inspection. If any changes in those responses have occurred since the inspection, please include both responses and a date that reflects when each change occurred.
 - a. Describe the waste streams generated in Building #6 and include waste determinations for each of these wastes.
 - b. Describe the flow of wastes in Building #6 from generation to offsite shipment, including any satellite accumulation containers, secondary storage locations, and how much time waste spends at each location.
 - c. Describe the Facility's process for labeling and dating waste drums that are stored in the Building #6 HWAA located in the building's basement.
 - d. How long were the hazardous waste drums seen in the Facility's HWAA during the August Inspection being stored there prior to the inspection?
 - e. Please document how the Facility knows how long those drums were in the less than 90 day HWAA and any proof the Facility may have documenting that the hazardous waste drums were not in the HWAA for longer than 90 days.
 - f.
7. Regarding Universal Waste generation and management at the Facility, please answer the following questions in terms of at the time of the inspection. If any changes have occurred in those responses since the inspection, please include both responses and provide a date that reflects when each of those changes occurred.
 - a. Describe in detail the Facility's process of handling Universal Waste bulbs at the Facility. Include how often bulbs are changed and on average how much is produced each month.
 - b. Describe the Facility schedule for sending Universal Waste bulbs offsite. How often are they sent and who are they sent to?
 - c. Are the bulbs observed during the August Inspection still present at the facility? These can be seen in Photo #s 14 & 15 of the Inspection Report. If they have been shipped offsite, please provide the manifest or bill of lading for that shipment.
 - d. Asdf

8. Regarding the Facility's hazardous waste inspection schedule and weekly hazardous waste inspection performance, please answer the following questions in terms of at the time of the inspection. If any changes have occurred in those responses since the inspection, please provide both responses and a date that reflects when each change occurred.
 - a. Describe the Facility's hazardous waste inspection process, including what areas are inspected.
 - b. Provide a copy of Facility hazardous waste weekly inspection records from January 2012 until present day. If more than one location is inspected, provide these documents for all locations.
9. Regarding any tanks that may be located at the Facility. Please answer the following questions in terms of at the time of the inspection. If any changes in those responses have occurred since the inspection, please provide both responses and a date that reflects when each change occurred.
 - a. Provide a comprehensive list of each waste storage tank located at the Facility.
 - b. Describe what is contained in each tank and provide a waste determination on all contents stored within tanks.
 - c. Describe how the contents of each tank got there, including the process that generated the waste, how it was transferred into the tank, and where it goes when it leaves the tank.
 - d. Please provide inspection records for each hazardous waste tank located at the Facility for the last 3 years.
 - e. Provide all 40 CFR Subpart J records from all monitoring conducted on each of the Facility's hazardous waste tanks for the last 3 years.
 - f. Provide engineering certificates for each hazardous waste tank located at the Facility.
10. Please answer the following questions regarding any waste tanks located at Penn United.
 - a. Provide a comprehensive list of each waste storage tank located at the Facility.

- b. Describe what is contained in each tank. Please include how the contents were generated, how the contents got in to the tank, and where the contents go when they leave the tank.
 - c. Provide a waste determination for all wastes that are contained within tanks at the Facility.
 - d. Provide engineering certifications for all tanks located at the Facility.
 - e. Are the tanks inspected? Please provide any inspection schedule the Facility uses to inspect its tanks.
 - f. Provide copies of all tank inspections from January 2012 to present.
 - g. Does the Facility conduct monitoring on the tanks? If so, please describe the Facility's monitoring program.
 - h. Provide monitoring documents for all tanks from January 2012 to present.
 - i. Asf
11. Regarding hazardous waste training that occurs at the Facility and employee job descriptions, please answer the following questions.
- 12.
- a. Provide a list of every employee position title that undergoes hazardous waste training at the Facility and provide a job description example for each one of these titles.
 - b. Provide hazardous waste training records for most current 3 years for Paul Bergbigler, Rege Weleski, Kevin Kroneberg, and Steve Berteotti
 - c. Provide job descriptions for Paul Bergbigler, Rege Weleski, Kevin Kroneberg, and Steve Berteotti.
 - d. Provide 2014 hazardous waste training records for any employee who transported hazardous waste drums from satellite areas to the secondary storage area to the less than 90 day storage area during that year.
13. In regards to the Facility's hazardous waste manifests. Please answer the following questions.
- a. Provide all hazardous waste manifests from January 2010 to the present day.

Start w/ small requests get large? Ending with manifests from last 5 years.
COOLANT

Please describe the facility's procedure for labeling and dating hazardous waste drums.

**please confirm the wastes generated in this building. Are the wastes listed in the description correct or are there less or more than what was stated?

The provisions of Section 3008 of RCRA, 42 U.S.C. § 6928, authorize EPA to pursue penalties for failure to comply with or respond adequately to an information request under Section 3007(a) of RCRA. In addition, providing false, fictitious, or fraudulent statements or representation may subject you to criminal penalties under 18 U.S.C. § 1001. The information you provide may be used by EPA in administrative, civil, or criminal proceedings.

You are entitled to assert a claim of business confidentiality covering any part or all of the information, in a manner described in 40 C.F.R. § 2.203(b). Information subject to a claim of business confidentiality will be made available to the public only in accordance with 40 C.F.R. Part 2, Subpart B. Unless a claim of business confidentiality is asserted at the time the requested information is submitted, EPA may make this information available to the public without further notice to you.

The request for information is not subject to review by the Office of Management and Budget pursuant to the Paperwork Reduction Act, 44 U.S.C. §§ 3501-3520.

Your response must include the following signed and dated certification:

I certify that the information contained in this response to EPA's request for information and the accompanying documents is true, accurate, and complete. As to the identified portions of this response for which I cannot personally verify their accuracy, I certify under penalty of law that this response and all attachments were prepared in accordance with a system designed to assure that qualified personnel properly gather and evaluate the information submitted. Based on my inquiry of the person or persons who manage the system, or those persons directly responsible for gathering the information, the information submitted is, to the best of my knowledge and belief, true, accurate, and complete. I am aware that there are significant penalties for submitting false information, including the possibility of fines and imprisonment for knowing violations.

Signature: _____

Name: _____

Title: _____

Please send, or otherwise ensure delivery of the requested information to:

Ms. Rebecca Serfass (3LC70)
Land and Chemicals Division
U.S. Environmental Protection Agency, Region III
1650 Arch Street
Philadelphia, PA 19103-2029

If you have any question concerning this matter please contact Ms. Rebecca Serfass,
RCRA Enforcement Officer, at (215) 814-2047 or serfass.rebecca@epa.gov.

Sincerely,

Carol Amend, Associate Director
Land and Chemicals Division
Office of Land Enforcement

Enclosures

cc: R. Serfass, 3LC70, w/o enc.

P. Belgiovane, 3LC70, w/o enc.

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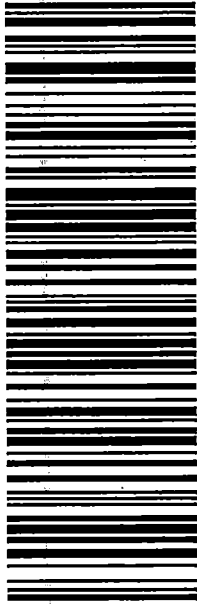

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PAULINE BELGIOVANE 215.814-2096 US EPA 1650 ARCH ST PHILADELPHIA PA 19103	0.0 LBS LTR 1 OF 1	SHIP TO: MR. STEVE BERTEOTTI PENN UNITED TECHNOLOGIES INC. 799 NORTH PIKE ROAD ENVIRONMENTAL HEALTH SAFETY MANAGER CABOT PA 16023-2223	PA 160 0-10 	UPS NEXT DAY AIR 1 TRACKING #: 1Z A43 F71 A2 9611 2735		BILLING: P/P ADULT SIGNATURE REQUIRED-MIN 21 Reference # 1: PA0000193409 Reference # 2: C15-025 IRL  CS 17.5.62. WNTNVS0 66.0A 07/2015
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UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
REGION III
1650 Arch Street
Philadelphia, Pennsylvania 19103-2029

VIA UPS

SEP 29 2015

Mr. Steve Berteotti
Environmental Health & Safety Manager
Penn United Technologies, Inc.
799 North Pike Road
Cabot, Pennsylvania 16023

Re: Request for Information Pursuant to Section 3007(a) of the Resource Conservation and Recovery Act, 42 U.S.C. § 6927(a), Regarding Generation and Management of Hazardous Waste by Penn United Technologies, Inc. EPA ID No. PA0000193409.

Information Request – Reference No. C15-025

Dear Mr. Berteotti,

The U.S. Environmental Protection Agency, Region III ("EPA") is requesting additional information to supplement the information obtained by the EPA during the August 27, 2014 Compliance Evaluation Inspection ("CEI" or "August Inspection") of Penn United Technologies, Inc. ("Penn United" or "the Facility") located at 799 North Pike Road in Cabot, Pennsylvania. EPA is requesting this information pursuant to the authority granted to it under Section 3007(a) of the Resource Conservation and Recovery Act ("RCRA"), 42 U.S.C. § 6927(a), which provides in relevant part that "any person who generates, stores, treats, transports, disposes of, or otherwise handles or has handled hazardous wastes shall, upon request of any officer, employee, or representative of the Environmental Protection Agency, duly designated by the Administrator, . . . furnish information relating to such wastes . . ." EPA hereby requires that you furnish to the EPA, **within thirty (30) calendar days** of receipt of this letter, the information requested below, including all documents responsive to such request.

For each and every request, if you have any reason to believe that there is a person(s) who may be able to provide a more detailed or complete response to such request or may be able to provide additional responsive documents, then as a part of your response to such request, identify each such person and the additional information or documents which such person may be able to provide. Furthermore, for each and every response, if information or documents

responsive to such request are not in your possession, custody or control, then as part of your response to such request, identify each person from whom such information or documents may be obtained.

Please provide a separate narrative response to each question. Precede each answer with the number of the question and letter of the subpart of the question to which it corresponds. A request for documents shall be construed as a request for any and all documents maintained by you or in your custody, control, or possession or in the possession, custody or control of any of your employees or agents, relating to the matters described below. For each copy of a document produced in response to this request, indicate on such copy, or in some other reasonable manner, the number of the request to which it responds, the current location and custodian of the original, the date such original was prepared, the persons(s) who prepared the original and the date the document became effective at the Facility.

As used herein, the term "document" means: writings (handwritten, typed, or otherwise produced or reproduced) and includes, but is not limited to, any invoices, checks, receipts, bills of lading, weight receipts, toll receipts, correspondence, offers, contracts, agreements, deeds, leases, manifests, licenses, permits, bids, proposals, policies of insurance, logs, books of original entry, minutes of meetings, memoranda, notes, calendar or daily entries, agendas, bulletins, notices, announcements, charts, maps, photographs, drawings, manuals, brochures, reports of scientific study or investigation, schedules, price lists, telegrams, teletypes, phonograph records, magnetic voice or video records, tapes, summaries, magnetic tapes, punch cards, recordings, discs, computer print outs, or other data compilations from which information can be obtained or translated.

All other terms used in this request for information that are defined in RCRA, 42 U.S.C. §§ 6901 *et seq.*, or 40 C.F.R. Parts 260-266 and 268 shall have the meanings set forth therein.

Requested Information

According to an inspection report documenting EPA's August Inspection, Building #1 of the Facility houses the tool and die manufacturing processes. Waste streams generated in this building include lubricating oils, waste oil, alcohol, coolant, spent coolant, and trash. The building previously contained four production lines until line #3 was removed. At the time of the inspection, a secondary storage area was in use where line #3 used to be. A small workshop at one end of Building #1 was also observed to be an accumulation area for universal waste.

1. Please answer the following questions in terms of at the time of the inspection. If any changes have occurred since the inspection, please include both responses and a date that reflects when each change occurred.
 - a. Describe each waste stream that is generated in Building #1. Please provide a hazardous waste determination for each of these wastes and an explanation of how

each determination was made including any documents used in making each determination.

- b. Identify each satellite accumulation container present, including what type of waste is stored in each container. Mark the location of each such container on a site layout diagram along with where the corresponding waste is generated.
- c. Describe the flow of the wastes contained in satellite accumulation areas in Building #1 from generation to shipment offsite. Include all locations in which it is stored and time spent at each location leading up to the offsite shipment.
- d. Describe the flow of wastes generated in Building #1 that are not contained in satellite accumulation areas from generation to shipment offsite. Include all locations in which it is stored and time spent at each location leading up to the offsite shipment.
- e. What is the exact date that the production line #3 was removed from service?
- f. Why was the production line #3 removed from service?
- g. Please describe how the secondary storage area, located where production line #3 used to be, is used and how long waste is stored there before being moved to the Facility's less than 90-day storage area.
- h. Please describe the Facility's process to label and date hazardous waste drums. When are the drums labeled as hazardous waste? When is the start accumulation date marked on the drums?

According to the inspection report documenting EPA's August Inspection, Building #2 of the Facility houses a stamping process, secondary operations, and warehousing. Waste streams in this building include trichloroethylene (F001), oily waste water, waste lubricating oil, and trash.

2. Please answer the following questions in terms of at the time of the inspection. If any changes have occurred since the inspection, please include both responses and a date reflecting when each change occurred.
 - a. Describe each waste stream that is generated in Building #2. Please provide a hazardous waste determination for each of these wastes and an explanation of how each determination was made including any documents used to make each determination.
 - b. Describe how the trichloroethylene (F001) waste is generated. Provide a detailed process of how, how much, and how often this waste stream is generated.

- c. Where is the F001 waste stored? Please describe the flow of this waste from point of generation to shipment offsite, including any satellite containers, all locations in which containers are stored in and the time frame it is stored there.
- d. Are there any satellite accumulation areas within Building #2? If so, please identify each container, what type of waste it contains, where it is located, and where its corresponding waste is generated. Please mark locations of containers and where it is generated on site map.
- e. Please describe the flow of any wastes associated with Building #2 from point of generation to shipment offsite, including satellite accumulation containers, all locations in which it is stored and the time frame it is stored there.
- f. Describe the Facility's process for labeling and dating hazardous waste drums, including satellite accumulation containers generated within Building #2.

According to the inspection report documenting EPA's August Inspection, Building #3 is used for maintenance purposes. Waste streams in this building include parts cleaning solutions (F006, D039), fluorescent light bulbs, and trash.

- 3. Please answer the following questions in terms of at the time of the inspection. If any changes have occurred since the inspection, please include both responses and a date that reflects when each change occurred.
 - a. Describe each waste stream that is generated in Building #3. Please provide a hazardous waste determination for each of these wastes and an explanation of how each determination was made including any documents used to make each determination.
 - b. Please describe the parts cleaning solutions (F006, D039) generated in this building. Include how much and how often this waste is generated.
 - c. Provide Material Safety Data Sheets (MSDS) for all of the parts cleaning solutions (F006, D039) mentioned in the Facility response to question 3b.
 - d. Describe the flow of the wastes associated with Building #3 from generation to offsite shipment. Include any satellite accumulation containers utilized, and all locations the waste is stored along the way including the timeframe it is stored there.
 - e. Describe the Facility's process for labeling and dating hazardous waste drums, including satellite accumulation containers generated within Building #3.

According to the inspection reports documenting EPA's August Inspection, Building #4 houses the Facility's electroplating operations. Various metals including nickel, tin, tin-lead, gold, silver, and palladium are used in the Facility's electroplating operations. Waste streams generated in this building include electroplating rinse (D002, F009), electroplating sludge (F006), gold cyanide stripper solution and solids (D003, F009), and gold and palladium filter cartridges (D003).

4. Please answer the following questions in terms of at the time of the inspection. If any changes in those responses have occurred since the inspection, please include both responses and a date that reflects when each change occurred.
 - a. Describe each waste stream that is generated in Building #4. Please provide a hazardous waste determination for each of these wastes and an explanation of how each determination was made, including any documents used to make each determination.
 - b. Describe where the gold and palladium filter cartridges (D003) are generated.
 - c. Are these filter cartridges sent for disposal or treatment? Please describe what happens to the cartridges once they leave the facility. Provide the name and location of the company/facility that the cartridges are sent to.
 - d. Describe what waste is being stored in each of the 55-gallon drums shown in Photo #7 of the inspection report and where each was generated.
 - e. Provide a detailed flow from generation to offsite shipment of the waste pictured in Photo #7 of the inspection report, including any satellite accumulation containers, secondary storage areas, and time spent in each location.
 - f. Describe the Facility's process for labeling and dating hazardous waste drums, including satellite accumulation containers, generated and/or stored within Building #4.
 - g. Describe the waste that is being contained in 55-gallon drums as seen in Photo #8 of the inspection report.
 - h. Describe the Facility's process to label and date hazardous waste drums. Provide an explanation as to how the Facility knows those two 55-gallon drums (Photo #8) were not being stored for longer than 90 days?
5. Building #5 is not discussed within the inspection report that documents EPA's August Inspection. Please answer the following questions in terms of at the time of the inspection. If any changes in those responses have occurred since the inspection, include both responses and a date that reflects when each change occurred.

- a. Describe each waste stream that is generated or stored in Building #5. Please provide a hazardous waste determination for each of these wastes and an explanation of how each determination was made, including any documents used to make each determination.
- b. Describe the flow of each of these wastes from generation to offsite shipment, including any satellite accumulation containers, secondary storage areas, and time spent in each location.
- c. Describe the Facility's process for labeling and dating hazardous waste drums, including satellite accumulation containers generated within Building #5.

According to the inspection report documenting EPA's August Inspection, Building #6 houses the tool and die manufacturing and precision assembly processes. Waste streams in this building include waste coolants and trash. The basement of Building #6 is where the Facility's designated less than 90 day hazardous waste accumulation area ("HWAA") is located. There were 25 full, 55-gallon drums in this HWAA at the time of the inspection as well as an orange cardboard box contained D003 hazardous waste. 5 of the 25 drums were labeled as non-hazardous waste, and 20 were labeled as hazardous waste. 11 of the 20 hazardous waste drums located in the Building #6 HWAA were not labeled with a start accumulation date

6. Please answer the following questions regarding Building #6 in terms of at the time of the inspection. If any changes in those responses have occurred since the inspection, please include both responses and a date that reflects when each change occurred.
 - a. Describe each waste stream that is generated in Building #6. Please provide a hazardous waste determination for each of these wastes and an explanation of how each determination was made, including any documents used to make each determination.
 - b. Describe the flow of wastes generated in Building #6 from generation to offsite shipment, including any satellite accumulation containers, all locations in which the waste is stored and how much time waste spends at each location.
 - c. Describe the Facility's process for labeling and dating waste drums that are stored in the Building #6 HWAA located in the building's basement.
 - d. How long were the hazardous waste drums seen in the Facility's HWAA during the August Inspection being stored there prior to the inspection?
 - e. Please document how the Facility knows how long those drums were in the less than 90 day HWAA and any proof the Facility may have documenting that the hazardous waste drums were not in the HWAA for longer than 90 days.

- f. Indicated which Uniform Hazardous Waste Manifest the drums located in the HWAA of Building #6 during the August Inspection were sent out on.
7. Regarding Universal Waste generation and management at the Facility, please answer the following questions in terms of at the time of the inspection. If any changes have occurred in those responses since the inspection, please include both responses and provide a date that reflects when each of those changes occurred.
- Describe in detail the Facility's process of handling Universal Waste bulbs at the Facility. Include how often bulbs are changed and on average how much is produced each month.
 - Describe the Facility's schedule for sending Universal Waste bulbs offsite. How often are they sent and what vendor are they sent to?
 - Are the bulbs observed during the August Inspection still present at the facility? These can be seen in Photo #s 14 & 15 of the Inspection Report. If they have been shipped offsite, please provide the manifest or bill of lading for that shipment.
 - Please provide bills of lading or manifests for Universal Waste bulb shipments made in the last 3 years.
8. Regarding the Facility's hazardous waste inspection schedule and weekly hazardous waste inspection performance, please answer the following questions in terms of at the time of the inspection. If any changes have occurred in those responses since the inspection, please provide both responses and a date that reflects when each change occurred.
- Describe the Facility's hazardous waste inspection process, including what areas are inspected.
 - Provide the Facility's written inspection schedule.
 - Provide a copy of Facility hazardous waste weekly inspection records from January 2012 until present day. If more than one location is inspected, provide these documents for all locations.
9. Regarding any tanks that may be located at the Facility. Please answer the following questions in terms of at the time of the inspection. If any changes in those responses have occurred since the inspection, please provide both responses and a date that reflects when each change occurred.
- Provide a comprehensive list of each waste storage tank located at the Facility.

- b. Describe what is contained in each tank and provide a waste determination on all contents stored within tanks.
 - c. Describe how the contents of each tank got there, including the process that generated the waste, how it was transferred into the tank, and where it goes when it leaves the tank.
 - d. Please provide inspection records for each hazardous waste tank located at the Facility for the last 3 years.
 - e. Provide all 40 CFR Subpart J monitoring records from all monitoring conducted on each of the Facility's hazardous waste tanks for the last 3 years.
 - f. Provide engineering certificates for each hazardous waste tank located at the Facility.
10. Regarding hazardous waste training that occurs at the Facility and employee job descriptions, please answer the following questions.
- a. Provide a list of every employee position title that undergoes hazardous waste training at the Facility and provide a job description example for each one of those titles.
 - b. Provide hazardous waste training records for the most current 3 years for Paul Bergbigler, Rege Weleski, Kevin Kroneberg, and Steve Berteotti
 - c. Provide job descriptions for Paul Bergbigler, Rege Welèski, Kevin Kroneberg, and Steve Berteotti.
 - d. Provide 2014 hazardous waste training records for any employee who transported hazardous waste drums from satellite areas to the secondary storage area to the less than 90 day storage area during that year.
11. In regards to the Facility's hazardous waste manifests. Please answer the following questions.
- a. Provide all Uniform Hazardous Waste Manifests used to ship waste offsite from the Facility from January 2010 to the present day.

A copy of the Inspection Report, documenting the findings of the inspector, is enclosed for your information.

The provisions of Section 3008 of RCRA, 42 U.S.C. § 6928, authorize EPA to pursue penalties for failure to comply with or respond adequately to an information request under Section 3007(a) of RCRA. In addition, providing false, fictitious, or fraudulent statements or representation may subject you to criminal penalties under 18 U.S.C. § 1001. The information you provide may be used by EPA in administrative, civil, or criminal proceedings.

You are entitled to assert a claim of business confidentiality covering any part or all of the information, in a manner described in 40 C.F.R. § 2.203(b). Information subject to a claim of business confidentiality will be made available to the public only in accordance with 40 C.F.R. Part 2, Subpart B. Unless a claim of business confidentiality is asserted at the time the requested information is submitted, EPA may make this information available to the public without further notice to you.

This request for information is not subject to review by the Office of Management and Budget pursuant to the Paperwork Reduction Act, 44 U.S.C. §§ 3501-3520.

Your response must include the following signed and dated certification:

I certify that the information contained in this response to EPA's request for information and the accompanying documents is true, accurate, and complete. As to the identified portions of this response for which I cannot personally verify their accuracy, I certify under penalty of law that this response and all attachments were prepared in accordance with a system designed to assure that qualified personnel properly gather and evaluate the information submitted. Based on my inquiry of the person or persons who manage the system, or those persons directly responsible for gathering the information, the information submitted is, to the best of my knowledge and belief, true, accurate, and complete. I am aware that there are significant penalties for submitting false information, including the possibility of fines and imprisonment for knowing violations.

Signature: _____
Name: _____
Title: _____

Please send, or otherwise ensure delivery of the requested information to:

Ms. Rebecca Serfass (3LC70)
Land and Chemicals Division
U.S. Environmental Protection Agency, Region III
1650 Arch Street
Philadelphia, PA 19103-2029

If you have any questions concerning this matter please contact Ms. Rebecca Serfass, RCRA Enforcement Officer, at (215) 814-2047 or serfass.rebecca@epa.gov.

Sincerely,

A handwritten signature in cursive script, reading "Carol Amend".

Carol Amend, Associate Director
Land and Chemicals Division
Office of Land Enforcement

Enclosures

cc: R. Serfass, 3LC70, w/o enc.

P. Belgiovane, 3LC70, w/o enc.

CONCURRENCES

SYMBOL <	3LC70	3LC70	3LC70						
SURNAME <	R. Serfass	C. Amend	P.Belgiovane						
	Ryf		PB						
DATE <	9/23/15		9/29/15						

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799 North Pike Road Cabot, PA 16023 - Phone: (724) 352-1507 Fax: (724) 352-4970 www.pennunited.com

October 5, 2015

Ms. Rebecca Serfass,
RCRA Enforcement Officer
US EPA
Region III
1650 Arch Street
Philadelphia, PA 19103-2029

Re: Request for Information Request – Reference No. C15-025
30-Day Extension Request

Dear Ms. Serfass,

As a follow-up to our conversation last Friday, October 2, 2015, I am requesting a 30-day extension to provide the information the EPA requires to make a full assessment of our systems for managing waste covered by RCRA, U.S.C. section 6927 (a). This is in relationship to the audit performed on August 27, 2014 by Mr. Robert Staves, Environmental Protection Specialist. His report and the accompanying Request for Information were received on October 1, 2015 by UPS. The thirty (30) calendar days would end on October 30, 2015. The requested thirty (30) day extension would end on November 30, 2015. The reason for the requested extension is (1) the voluminous amount of information requested, (2) the need to correct the inaccuracies of Mr. Staves report, and (3) the fact that the audit was conducted thirteen (13) months ago and our efforts to fully evaluate what was happening then will take additional time.

In addition to my request for an extension of time, I would appreciate an electronic copy of the photographs included in Mr. Staves' report as this will help me to respond to the specific requests relating to the photographs. I am hoping to expand the photo to read the labels as again trying to recreate the specific scenario from 13 months ago will be difficult without being able to accurately review what is in the photographs.

If you have any questions, please contact me at (724) 352-1507, ext. 4610 or by e-mail at Steve_Berteotti@pennunited.com.

Sincerely,

A handwritten signature in black ink that reads 'Stephen J. Berteotti'.

Stephen J. Berteotti
EHS Manager

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UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
REGION III
1650 Arch Street
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VIA UPS

Ms. Melissa Gross, Chief
Hazardous Waste Compliance and Enforcement
Department of Environmental Protection
Rachel Carson Building
P.O. Box 8763
Harrisburg, PA 17105-8763

APR 12 2016

**Re: RCRA Notice of Violation
Penn United Technologies, Inc.
EPA ID No. PA0000193409**

Dear Ms. Gross,

The U.S. Environmental Protection Agency, Region III is pursuing the issuance of a Notice of Violation ("NOV") to Penn United Technologies, Inc. located in Cabot, PA subsequent to the Resource Conservation and Recovery Act ("RCRA") as amended by the Hazardous and Solid Waste Amendments (HSWA) of 1984. The NOV will address hazardous waste violations of RCRA Subtitle C.

We appreciate your cooperation in this matter and look forward to your continued efforts towards a successful enforcement program. Should you have any questions or concerns regarding this proceeding, please feel free to contact me at (215) 814-5430 or Rebecca Serfass at (215) 814-2047.

Sincerely,

A handwritten signature in cursive script that reads "Carol Amend".

Carol Amend, Associate Director
Land and Chemicals Division
Office of Land Enforcement

cc: R. Serfass, 3LC70 ✓

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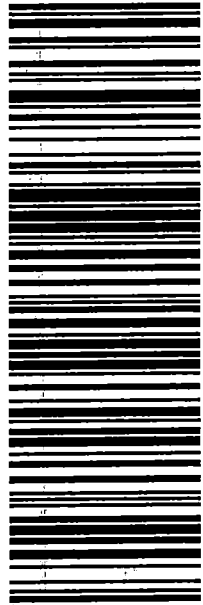

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UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
REGION III
1650 Arch Street
Philadelphia, Pennsylvania 19103-2029

VIA UPS

MAY 12 2016

Mr. Steve Berteotti
Environmental, Health, & Safety Manager
Penn United Technologies Inc.
799 North Pike Road
Cabot, PA 16023

**Re: Notice of Violation
Compliance Evaluation Inspection
August 27, 2014
EPA ID No. – PA0000193409**

Docket Number: R3-16-NOV-RCRA-014

Dear Mr. Berteotti,

On August 27, 2014, the U.S. Environmental Protection Agency, Region III ("EPA") conducted a Compliance Evaluation Inspection ("CEI") under the Pennsylvania Solid Waste Management Act ("SWMA") and Resource Conservation and Recovery Act ("RCRA"), as amended 42 U.S.C. Section 6901 et seq. at Penn United Technologies Inc. ("Penn United" or "Facility"). Based on this inspection, information obtained from an Information Request Letter ("IRL") from EPA to the Facility dated September 29, 2015, and/or review of other pertinent information, EPA has determined that Penn United is in violation of regulations promulgated under RCRA. As a result of this finding, the EPA is issuing this **Notice of Violation ("NOV")**. The specific violation(s) is as follows:

1. The Facility failed to mark hazardous waste containers with a start accumulation date. At the time of the inspection, EPA inspector noted approximately 11 hazardous waste containers that did not have a start accumulation date on them. As per 25 PA 262a.10., which incorporates by reference 40 CFR 262.34(a)(2), the date upon which each period of accumulations begins must be clearly marked and visible for inspection on each hazardous waste container.
2. The Facility failed to conduct weekly inspections of its Hazardous Waste Accumulation Area ("HWAA"). At the time of the inspection, Penn United provided documentation

that indicated the Facility failed to conduct weekly inspections of its HWAA on 22 occasions between 2013 and 2014. As per 25 PA 265a.1., which incorporates by reference 40 CFR 265.174, any facility that stores containers of hazardous waste is required to conduct at least weekly inspections of any location where the hazardous waste containers are stored.

3. The Facility failed to store waste lamps within closed containers. At the time of the inspection, Penn United was storing approximately 200 waste lamps at the Facility. Many of these lamps were not stored in closed containers. As per 25 PA 266b.1., which incorporates by reference 40 CFR 273.13(d)(1), small quantity handlers of universal waste are required to store waste lamps in containers that are structurally sound and must remain closed.
4. The Facility failed to label containers storing waste lamps. At the time of the inspection, many of the Facility's waste lamps were being stored in containers that were not labeled. As per 25 PA 266b.1., which incorporates by reference 40 CFR 273.14(e), small quantity handlers of universal waste are required to store waste lamps in containers that are labeled clearly with one of the following phrases: "Universal Waste Lamps", "Waste Lamps", or "Used Lamps".
5. The Facility failed to notify the Pennsylvania Department of Environmental Protection ("PADEP") and/or EPA of its management of a Hazardous Secondary Material ("HSM") in order to qualify for exclusions the Facility appears to be operating under. In order to qualify for the exclusions available under the new Definition of Solid Waste ("DSW"), the Facility is required to notify using EPA Form 8700-12. As per 25 PA 261a.1., which incorporates by reference 40 CFR 261.4(a)(24)(vii) that references 40 CFR 260.42, facilities are required to send notification of HSM management prior to operating under new DSW exclusions. As well as sending this notification, the Facility must comply with all of the requirements listed under 40 CFR 261.4(a)(24) in order to qualify for the HSM exclusion.
6. The Facility failed to meet the requirements to qualify for exemptions regarding its reclamation of precious metals. Penn United failed to notify the state and/or EPA of its reclamation of precious metals under section 3010 of RCRA. Penn United has also failed to maintain records documenting that these recycled materials are not being speculatively accumulated as per 25 PA 266a.1., which incorporates by reference 40 CFR 266.70.

Areas of Concern

- a. Please note that as per 25 PA 266b.1., which incorporates by reference 40 CFR 273.15, small quantity handlers of universal waste may store waste lamps for up to and not exceeding one year and records must be maintained to demonstrate that the Facility is not exceeding this one year limit.
- b. Please note that as per 25 PA 262.a.10., which incorporates by reference 40 CFR 262.34(c)(1), a generator may store as much as, not exceeding, 55 gallons of hazardous

waste in a satellite accumulation area container. One cubic yard totes exceed 55 gallons and if hazardous waste, that does not meet the precious metal exemption or the hazardous secondary material exclusion, is being stored in them, the containers must be marked with a start accumulation date once 55 gallons is exceeded.

Within **thirty (30) calendar days** of the receipt of this NOV, please submit to EPA a response documenting the measures that the Facility has taken or is taking to achieve compliance with the violations and Areas of Concern noted above or provide an explanation of facts and circumstances, including any relevant documentation, that cause you to believe that EPA's determination of the alleged violations are in error. If the compliance measures identified are planned or are on-going, please provide a schedule for when the compliance measures will be completed.

Section 3008(a) of RCRA authorizes EPA to take an enforcement action whenever it is determined that any person has violated, or is in violation, of any requirement of RCRA as amended. Such an action could include a penalty of up to \$37,500 per day of violation. In addition, failure to achieve and maintain compliance with the regulations cited in this Notice of Violation may be treated as a repeated offense and may constitute a "knowing" violation of Federal law.

With regard to the Small Business Regulatory Enforcement and Fairness Act (SBREFA), please see the "Small Business Resources Information Sheet" memo, enclosed, which might be applicable to your company. This enclosure provides information on contacting the SBREFA Ombudsman to comment on federal enforcement and compliance activities and also provides information on compliance assistance. As noted in the enclosure, any decision to participate in such program or to seek compliance assistance does not relieve you of your obligation to respond in a timely manner to an EPA request or other enforcement action, create any rights or defenses under law, and will not affect EPA's decision to pursue this enforcement action. To preserve your legal rights, you must comply with all rules governing the administrative enforcement process. The Ombudsman and fairness boards do not participate in the resolution of EPA's enforcement action. EPA has not made a determination as to whether or not you [or your company] are covered by the SBREFA.

This NOV is not intended to address all past violations, nor does it preclude EPA from including any ongoing, including the ones cited in this letter, or past violations in any future enforcement action. Any response to this NOV shall be addressed to:

Ms. Rebecca Serfass
U.S. Environmental Protection Agency, Region III
1650 Arch Street
Philadelphia, PA 19103
Serfass.Rebecca@epa.gov
(p): 215-814-2047



Carol Amend, Associate Director
Land and Chemicals Division
Office of Land Enforcement

Date: ~~Apr~~ May 12, 2016

Enclosure

cc: M. Gross, PADEP, w/o enclosure

R. Serfass, 3LC70, w/o enclosure

P. Belgiovane, 3LC70, w/o enclosure

CONCURRENCES

SYMBOL <	3LC70	3LC70	3LC70						
SURNAME<	R. Serfass	C. Amend	P. Belgovane						
	<i>RKf</i>		<i>AB</i>						
DATE <	5/3/16		5/12/16						

EPA Form 1320-1 (12-70) OFFICIAL FILE COPY

RKf
5/9/16

June 9, 2016

Ms. Rebecca Serfass
US Environmental Protection Agency, Region III
1650 Arch Street
Philadelphia, PA 19103

Re: Notice of Violation Response, Docket No. R3-16-NOV-RCRA-014
Compliance Evaluation Inspection, August 27, 2014
EPA ID No. PA0000193409

Dear Ms. Serfass,

The subject Notice of Violation was delivered by UPS on May 13, 2016. Our response must be made by June 10, 2016 to meet the thirty (30) calendar day response time. Penn United's response to each of six (6) NOV's and the two (2) areas of concern are documented below. It should also be noted that Penn United Technologies Inc. successfully obtained ISO 14001 certification on June 4, 2015. Several procedures were created and implemented with training for this certification that directly supports the findings below.

1. The Facility failed to mark hazardous waste containers with a start accumulation date. At the time of the inspection, EPA inspector noted approximately 11 hazardous waste containers that did not have a start accumulation date on them. As per 25 PA 262a.10, which incorporates by reference 40 CFR 262.34(a)(2), the date upon which each period of accumulation begins must be clearly marked and visible for inspection on each hazardous waste container.

RESPONSE:

At the time of the inspection there were drums in the plating facility that did not have an accumulation date on the container or label. Since this inspection our procedure to labeling hazardous waste containers now includes a separate label, Satellite Area Accumulation Start Date to track when waste begins to be added to a container in this area. When transferred to the hazardous waste accumulation area, this date will be recorded on the hazardous waste label. Procedure ENV-0005, Waste Material Storage Management has been revised to reflect this change.

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2. The Facility failed to conduct weekly inspections of its Hazardous Waste Accumulation Area ("HWAA"). At the time of the inspection, Penn United provided documentation that indicated the Facility failed to conduct weekly inspections of its HWAA on 22 occasions between 2013 and 2014. As per 25 PA 265a.1, which incorporates by reference 40 CFR 265.174, any facility that stores containers of hazardous waste is required to conduct at least weekly inspections of any location where the hazardous waste containers are stored.

RESPONSE:

At the time of the inspection, the records for the weekly inspection of the hazardous waste accumulation area in the plating facility did indicate the inspection for some weeks were not recorded. Since this inspection, documented weekly inspections have been completed in accordance with our procedure ENV-0005 Waste Material Storage Management. A plating lab chemist performs this task, with her Supervisor as back-up in her absence. Both have completed RCRA training for hazardous waste.

3. The Facility failed to store waste lamps within closed containers. At the time of the inspection, Penn United was storing approximately 200 waste lamps at the Facility. Many of these lamps were not stored in closed containers. As per 25 PA 266b.1, which incorporates by reference 40 CFR 273.13(d)(1), small quantity handlers of universal waste are required to store waste lamps in containers that are structurally sound and must remain closed.

RESPONSE:

At the time of the inspection, the Universal Waste Accumulation area that stored the universal waste lamps did exhibit used lamps that were not stored in containers, containers that were not closed and containers without labels. These issues were resolved the same day and to prevent future non-compliance the following changes have been made:

- Limited the number of maintenance employees that handle the waste lamps,
- Moved the accumulation area to a more visible storage area,
- Weekly visual inspection by maintenance Team Leader,
- Purchased new labels that list the contents "Used Lamps" on each label,
- Posted storage requirements in the universal waste accumulation area,
- Created a procedure, ENV-0026 Handling of Fluorescent and Compact Fluorescent Lamps

4. The Facility failed to label containers storing waste lamps. At the time of the inspection, many of the Facility's waste lamps were being stored in containers that were not labeled. As per 25 PA 266 b.1., which incorporates by reference 40 CFR 273.14(e), small quantity handlers of universal waste are required to store waste lamps in containers that are labeled clearly with one of the following phrases: "Universal Waste Lamps", "Waste Lamps" or "Used Lamps".

RESPONSE:

At the time of the inspection, the Universal Waste Accumulation area that stored the universal waste lamps did exhibit used lamps that were not stored in containers, containers that were not closed and containers without labels. These issues were resolved the day of the inspection and to prevent future non-compliance the following changes have been made:

- Limited the number of maintenance employees that handle the waste lamps,
 - Moved the accumulation area to a more visible storage area,
 - Weekly visual inspection by maintenance Team Leader,
 - Purchased new labels that list the contents "Used Lamps" on each label,
 - Posted storage requirements in this universal waste accumulation area,
 - Created a procedure, ENV-0026 Handling of Fluorescent and Compact Fluorescent Lamps
5. The Facility failed to notify the Pennsylvania Department of Environmental Protection ("PADEP") and/or EPA of its management of a Hazardous Secondary Material ("HSM") in order to qualify for exclusions the Facility appears to be operating under. In order to qualify for the exclusions available under the new Definitions of Solid Waste ("DSW"), the Facility is required to notify using EPA Form 8700-12. As per 25 PA 261 a.1., which incorporates by reference 40 CFR 261.4(a)(24)(vii) that references 40 CFR 260.42, facilities are required to send notification of HSM management prior to operating under new DSW exclusions. As well as sending this notification, the Facility must comply with all of the requirements listed under 40 CFR 261.4(a)(24) in order to qualify for the HSM exclusion.

RESPONSE:

At the time of the inspection, Penn United was not operating under the exclusions of 40 CFR 261.4 for precious metals or Hazardous Secondary Material ("HSM"). During the EPA inspection of August 28, 2014 the Inspector mentioned that he thought there was an exemption for precious metals and in our response to the EPA, did inquire about this exemption. We are evaluating if filing for a "HSM" exemption is warranted.

6. The Facility failed to meet the requirements to qualify for exemptions regarding its reclamation of precious metals. Penn United failed to notify the state and/or EPA of its reclamation of precious metals under section 3010 of RCRA. Penn United has also failed to maintain records documenting that these recycled materials are not being speculatively accumulated as per 25 PA 266 a.1., which incorporates by reference 40 CFR 266.70.

RESPONSE:

At the time of the inspection, Penn United was not managing the precious metal wastes with the exemption under 3010 of RCRA. This option was brought to our attention by the EPA Inspector when he was on site during the August 27, 2014 inspection. All of our records as provided by manifests show these materials were shipped out quarterly, within 90 days of the accumulation start date. As such, Penn

United was not accumulating speculatively. The manifests were all provided in the November 25, 2015 response to the Request for Information.

Areas of Concern

- a. Please note that as per 25 PA 266 b.1., which incorporates by reference 40 CFR 273.15, small quantity handlers of universal waste may store waste lamps for up to and not exceeding once year and records must be maintained to demonstrate that the Facility is not exceeding this one year limit.

RESPONSE:

Based upon record review, Penn United stores "Used Lamps" for less than a year.

- b. Please note that as per 25 PA 262. A.10., which incorporates by reference 40 CFR 263.349(c)(1), a generator may store as much as, not exceeding, 55 gallons of hazardous waste in a satellite accumulation area container. One cubic yard totes exceed 55 gallons and if hazardous waste, that does not meet the precious metal or the hazardous secondary material exclusion, is being stored in them, the containers must be marked with a start accumulation date once 55 gallons is exceeded.

RESPONSE:

The tin/ tin-lead filters and nickel filters that are stored in the 1 cubic yard boxes are managed as hazardous waste. They are dated when accumulation begins and are stored for less than 90 days. The posted signage reflects this is a 90-day hazardous waste accumulation area. The area is secured and has proper containment.

If you have any questions regarding this response, please contact me at the above number, extension 4610 or by e-mail at Steve_Berteotti@pennunited.com.

Sincerely,



Stephen J Berteotti
EHS Manager

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RLS 6/24/16



799 North Pike Road Cabot, PA 16023 - Phone: (724) 352-1507 Fax: (724) 352-4970 www.pennunited.com

June 24, 2016

PA Department of Environmental Protection
Bureau of Waste Management
Division of Hazardous Waste Management
PO Box 69170
Harrisburg, PA 17106-9170

Subject: RCRA Subtitle C Site Identification Form
Subsequent Notification
Secondary Hazardous Material Management

Dear Sir or Madam,

Please find enclosed Penn United Technologies Inc. notification for management of Secondary Hazardous Materials ("HSM") in accordance with 25 PA 261a.1, on EPA form 8700-12-13. Also enclosed is a certification of financial assurance pursuant to 40 CFR 261.4(a)(24)(vi).

If you have any questions, please contact me at the above number or by e-mail at Steve_Berteotti@pennunited.com.

Sincerely,

A handwritten signature in black ink that reads 'Stephen Berteotti'.

Stephen J. Berteotti
EHS Manager

Enclosures

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799 North Pike Road Cabot, PA 16023 - Phone: (724) 352-1507 Fax: (724) 352-4970 www.pennunited.com

Letter From Chief Financial Officer

Pennsylvania Department of Environmental Protection
Bureau of Waste Management
Division of Hazardous Waste Management
P.O. Box 69170
Harrisburg, PA 17106-9170

I am the chief financial officer of Penn United Technologies, Inc., located at 795 North Pike Road, Cabot, PA 16023. This letter is in support of the use of the financial test to demonstrate financial responsibility for liability coverage under § 261.147 and costs assured § 261.143(e) as specified in subpart H of 40 CFR part 261.

The firm identified above is the owner or operator of the following facilities for which liability coverage for both sudden and nonsudden accidental occurrences is being demonstrated through the financial test specified in subpart H of 40 CFR part 261: 795 North Pike Road, Cabot, PA 16023 – EPA ID: PA0 000 193 409

The firm identified above guarantees, through the guarantee specified in subpart H of 40 CFR part 261, liability coverage for both sudden and nonsudden accidental occurrences at the following facilities owned or operated by the following: None. The firm identified above is the direct or higher-tier parent corporation of the owner or operator.

The firm identified above is the owner or operator of the following facilities for which liability coverage for both sudden and nonsudden accidental occurrences is being demonstrated through the financial test specified in subpart H of 40 CFR parts 264 and 265: 795 North Pike Road, Cabot, PA 16023 – EPA ID: PA0 000 193 409

The firm identified above guarantees, through the guarantee specified in subpart H of 40 CFR parts 264 and 265, liability coverage for both sudden and nonsudden accidental occurrences at the following facilities owned or operated by the following: None. The firm identified above is the direct or higher-tier parent corporation of the owner or operator.

This firm is not required to file a Form 10K with the Securities and Exchange Commission (SEC) for the latest fiscal year.

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Page 2 of 2

The fiscal year of this firm ends on March 31. The figures for the following items marked with an asterisk are derived from this firm's independently reviewed, year-end financial statements for the latest completed fiscal year, ended March 31, 2016.

Part A. Liability Coverage for Accidental Occurrences

Alternative I

1. Amount of annual aggregate liability coverage to be demonstrated \$2,000,000.
- *2. Current assets \$39,130,643.
- *3. Current liabilities \$17,404,519.
4. Net working capital (line 2 minus line 3) \$21,726,124.
- *5. Tangible net worth \$66,478,752.
- *6. If less than 90% of assets are located in the U.S., give total U.S. assets \$N/A.
7. Is line 5 at least \$10 million? Yes.
8. Is line 4 at least 6 times line 1? Yes.
9. Is line 5 at least 6 times line 1? Yes.
- *10. Are at least 90% of assets located in the U.S.? Yes. If not, complete line 11.
11. Is line 6 at least 6 times line 1? N/A.


I hereby certify that the wording of this letter is identical to the wording specified in 40 CFR 261.151(f) as such regulations were constituted on the date shown immediately below.



Michael D. Gore
Chief Financial Officer
June 22, 2016

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SEND COMPLETED FORM TO: The Appropriate State or Regional Office.	United States Environmental Protection Agency RCRA SUBTITLE C SITE IDENTIFICATION FORM		
1. Reason for Submittal MARK ALL BOX(ES) THAT APPLY	Reason for Submittal: <input type="checkbox"/> To provide an Initial Notification (first time submitting site identification information / to obtain an EPA ID number for this location) <input checked="" type="checkbox"/> To provide a Subsequent Notification (to update site identification information for this location) <input type="checkbox"/> As a component of a First RCRA Hazardous Waste Part A Permit Application <input type="checkbox"/> As a component of a Revised RCRA Hazardous Waste Part A Permit Application (Amendment # _____) <input type="checkbox"/> As a component of the Hazardous Waste Report (If marked, see sub-bullet below) <input type="checkbox"/> Site was a TSD facility and/or generator of >1,000 kg of hazardous waste, >1 kg of acute hazardous waste, or >100 kg of acute hazardous waste spill cleanup in one or more months of the report year: (or State equivalent LQG regulations)		
2. Site EPA ID Number	EPA ID Number <u>PA0000193409</u>		
3. Site Name	Name: <u>Penn United Technologies, Inc.</u>		
4. Site Location Information	Street Address: <u>799 N Pike Rd</u> City, Town, or Village: <u>Cabot</u> County: <u>Butler</u> State: <u>PA</u> Country: <u>USA</u> Zip Code: <u>16023</u>		
5. Site Land Type	<input checked="" type="checkbox"/> Private <input type="checkbox"/> County <input type="checkbox"/> District <input type="checkbox"/> Federal <input type="checkbox"/> Tribal <input type="checkbox"/> Municipal <input type="checkbox"/> State <input type="checkbox"/> Other		
6. NAICS Code(s) for the Site (at least 5-digit codes)	A. <u>332813</u> C. <u> </u> B. <u> </u> D. <u> </u>		
7. Site Mailing Address	Street or P.O. Box: <u>Po Box 399</u> City, Town, or Village: <u>Saxenburg</u> State: <u>PA</u> Country: <u>USA</u> Zip Code: <u>16056</u>		
8. Site Contact Person	First Name: <u>Stephen</u> MI: <u>J</u> Last: <u>Berteotti</u> Title: <u>EHS Manager</u> Street or P.O. Box: <u>799 N Pike Rd</u> City, Town or Village: <u>Cabot</u> State: <u>PA</u> Country: <u>USA</u> Zip Code: <u>16023</u> Email: <u>Steve.Berteotti@pennunited.com</u> Phone: <u>724 352 1507</u> Ext.: <u>4610</u> Fax: <u> </u>		
9. Legal Owner and Operator of the Site	A. Name of Site's Legal Owner: <u>Penn United Technologies, Inc.</u> Date Became Owner: <u> </u> Owner Type: <input checked="" type="checkbox"/> Private <input type="checkbox"/> County <input type="checkbox"/> District <input type="checkbox"/> Federal <input type="checkbox"/> Tribal <input type="checkbox"/> Municipal <input type="checkbox"/> State <input type="checkbox"/> Other Street or P.O. Box: <u>799 N Pike Rd</u> City, Town, or Village: <u>Cabot</u> Phone: <u>724 352 1507</u> State: <u>PA</u> Country: <u>USA</u> Zip Code: <u>16023</u> B. Name of Site's Operator: <u>Penn United Technologies, Inc.</u> Date Became Operator: <u>1971</u> Operator Type: <input checked="" type="checkbox"/> Private <input type="checkbox"/> County <input type="checkbox"/> District <input type="checkbox"/> Federal <input type="checkbox"/> Tribal <input type="checkbox"/> Municipal <input type="checkbox"/> State <input type="checkbox"/> Other		

10. Type of Regulated Waste Activity (at your site)

Mark "Yes" or "No" for all current activities (as of the date submitting the form); complete any additional boxes as instructed.

A. Hazardous Waste Activities; Complete all parts 1-10.Y ☒ N ☐**1. Generator of Hazardous Waste**

If "Yes," mark only one of the following - a, b, or c.

- ☒ a. LQG: Generates, in any calendar month, 1,000 kg/mo (2,200 lbs/mo.) or more of hazardous waste; or Generates, in any calendar month, or accumulates at any time, more than 1 kg/mo (2.2 lbs/mo) of acute hazardous waste; or Generates, in any calendar month, or accumulates at any time, more than 100 kg/mo (220 lbs/mo) of acute hazardous spill cleanup material.

- ☐ b. SQG: 100 to 1,000 kg/mo (220 - 2,200 lbs/mo) of non-acute hazardous waste.

- ☐ c. CESQG: Less than 100 kg/mo (220 lbs/mo) of non-acute hazardous waste.

If "Yes" above, indicate other generator activities in 2-10.

Y ☐ N ☒**5. Transporter of Hazardous Waste**

If "Yes," mark all that apply.

- ☐ a. Transporter
☐ b. Transfer Facility (at your site)

Y ☐ N ☒**6. Treater, Storer, or Disposer of Hazardous Waste**

Note: A hazardous waste Part B permit is required for these activities.

Y ☒ N ☐**7. Recycler of Hazardous Waste**Y ☐ N ☒**8. Exempt Boiler and/or Industrial Furnace**

If "Yes," mark all that apply.

- ☐ a. Small Quantity On-site Burner Exemption
☐ b. Smelting, Melting, and Refining Furnace Exemption

Y ☐ N ☒**2. Short-Term Generator** (generate from a short-term or one-time event and not from on-going processes). If "Yes," provide an explanation in the Comments section.Y ☐ N ☒**3. United States Importer of Hazardous Waste**Y ☐ N ☒**9. Underground Injection Control**Y ☐ N ☒**4. Mixed Waste (hazardous and radioactive) Generator**Y ☐ N ☒**10. Receives Hazardous Waste from Off-site****B. Universal Waste Activities; Complete all parts 1-2.**Y ☐ N ☒**1. Large Quantity Handler of Universal Waste** (you accumulate 5,000 kg or more) [refer to your State regulations to determine what is regulated]. Indicate types of universal waste managed at your site. If "Yes," mark all that apply.

- a. Batteries ☐
b. Pesticides ☐
c. Mercury containing equipment ☐
d. Lamps ☐
e. Other (specify) _____ ☐
f. Other (specify) _____ ☐
g. Other (specify) _____ ☐

Y ☐ N ☒**2. Destination Facility for Universal Waste**

Note: A hazardous waste permit may be required for this activity.

C. Used Oil Activities; Complete all parts 1-4.Y ☐ N ☒**1. Used Oil Transporter**

If "Yes," mark all that apply.

- ☐ a. Transporter
☐ b. Transfer Facility (at your site)

Y ☐ N ☒**2. Used Oil Processor and/or Re-refiner**

If "Yes," mark all that apply.

- ☐ a. Processor
☐ b. Re-refiner

Y ☐ N ☒**3. Off-Specification Used Oil Burner**Y ☐ N ☒**4. Used Oil Fuel Marketer**

If "Yes," mark all that apply.

- ☐ a. Marketer Who Directs Shipment of Off-Specification Used Oil to Off-Specification Used Oil Burner
☐ b. Marketer Who First Claims the Used Oil Meets the Specifications

D. Eligible Academic Entities with Laboratories—Notification for opting into or withdrawing from managing laboratory hazardous wastes pursuant to 40 CFR Part 262 Subpart K❖ You can **ONLY** Opt into Subpart K if:

- you are at least one of the following: a college or university; a teaching hospital that is owned by or has a formal affiliation agreement with a college or university; or a non-profit research institute that is owned by or has a formal affiliation agreement with a college or university; AND
- you have checked with your State to determine if 40 CFR Part 262 Subpart K is effective in your state

☐ Y ☒ N 1. Opting into or currently operating under 40 CFR Part 262 Subpart K for the management of hazardous wastes in laboratories
See the item-by-item instructions for definitions of types of eligible academic entities. Mark all that apply:

☐ a. College or University☐ b. Teaching Hospital that is owned by or has a formal written affiliation agreement with a college or university☐ c. Non-profit Institute that is owned by or has a formal written affiliation agreement with a college or university

☐ Y ☒ N 2. Withdrawing from 40 CFR Part 262 Subpart K for the management of hazardous wastes in laboratories

11. Description of Hazardous Waste

A. Waste Codes for Federally Regulated Hazardous Wastes. Please list the waste codes of the Federal hazardous wastes handled at your site. List them in the order they are presented in the regulations (e.g., D001, D003, F007, U112). Use an additional page if more spaces are needed.

D001						
D002						
D003						
D008						
D011						
F006						
F007						

B. Waste Codes for State-Regulated (i.e., non-Federal) Hazardous Wastes. Please list the waste codes of the State-Regulated hazardous wastes handled at your site. List them in the order they are presented in the regulations. Use an additional page if more spaces are needed.

12. Notification of Hazardous Secondary Material (HSM) Activity

Y ☒ N ☐ Are you notifying under 40 CFR 260.42 that you will begin managing, are managing, or will stop managing hazardous secondary material under 40 CFR 261.2(a)(2)(ii), 40 CFR 261.4(a)(23), (24), or (25)?

If "Yes," you must fill out the Addendum to the Site Identification Form: Notification for Managing Hazardous Secondary Material.

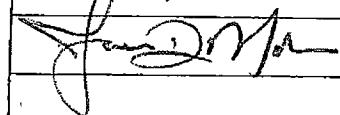
13. Comments

14. Certification. I certify under penalty of law that this document and all attachments were prepared under my direction or supervision in accordance with a system designed to assure that qualified personnel properly gather and evaluate the information submitted. Based on my inquiry of the person or persons who manage the system, or those persons directly responsible for gathering the information, the information submitted is, to the best of my knowledge and belief, true, accurate, and complete. I am aware that there are significant penalties for submitting false information, including the possibility of fines and imprisonment for knowing violations. For the RCRA Hazardous Waste Part A Permit Application, all owner(s) and operator(s) must sign (see 40 CFR 270.10(b) and 270.11).

Signature of legal owner, operator, or an authorized representative

Name and Official Title (type or print)

Date Signed
(mm/dd/yyyy)



V.P. Manufacturing

6/24/2016

ADDENDUM TO THE SITE IDENTIFICATION FORM: NOTIFICATION OF HAZARDOUS SECONDARY MATERIAL ACTIVITY

**ONLY fill out this form if:**

- ❖ You are located in a State that allows you to manage excluded hazardous secondary material (HSM) under 40 CFR 261.2(a)(2)(ii), 261.4(a)(23), (24), or (25) (or state equivalent). See <http://www.epa.gov/epawaste/hazard/dsw/statespf.htm> for a list of eligible states; AND
- ❖ You are or will be managing excluded HSM in compliance with 40 CFR 261.2(a)(2)(ii), 261.4(a)(23), (24), or (25) (or state equivalent) or you have stopped managing excluded HSM in compliance with the exclusion(s) and do not expect to manage any amount of excluded HSM under the exclusion(s) for at least one year. Do not include any information regarding your hazardous waste activities in this section.

1. Indicate reason for notification. Include dates where requested.

- ☒ Facility will begin managing excluded HSM as of 06/30/16 (mm/dd/yyyy).
- ☐ Facility is still managing excluded HSM/re-notifying as required by March 1 of each even-numbered year.
- ☐ Facility has stopped managing excluded HSM as of _____ (mm/dd/yyyy) and is notifying as required.

2. Description of excluded HSM activity. Please list the appropriate codes and quantities in short tons to describe your excluded HSM activity ONLY (do not include any information regarding your hazardous wastes). Use additional pages if more space is needed.

a. Facility code (answer using codes listed in the Code List section of the instructions)	b. Waste code(s) for HSM	c. Estimated short tons of excluded HSM to be managed annually	d. Actual short tons of excluded HSM that was managed during the most recent odd- numbered year	e. Land-based unit code (answer using codes listed in the Code List section of the instructions)
01	F006		29.8 T	NA
01	F006, F011		1.46 T	NA
06	F006, D008		54.6 T	
06	F006		7.9 T	
06	F006, F011		1.4 T	
06	F006		0.5 T	
06	F006, F011		0.09 T	
06	F006		0.16 T	

3. Facility has financial assurance pursuant to 40 CFR 261.4(a)(24)(vi). (Financial assurance is required for reclaimers and intermediate facilities managing excluded HSM under 40 CFR 261.4(a)(24) and (25))

Y ☒ N ☐ Does this facility have financial assurance pursuant to 40 CFR 261.4(a)(24)(vi)?

ADDENDUM TO THE SITE IDENTIFICATION FORM: NOTIFICATION OF HAZARDOUS SECONDARY MATERIAL ACTIVITY

**ONLY fill out this form if:**

- ❖ You are located in a State that allows you to manage excluded hazardous secondary material (HSM) under 40 CFR 261.2(a)(2)(ii), 261.4(a)(23), (24), or (25) (or state equivalent). See <http://www.epa.gov/epawaste/hazard/dsw/statespf.htm> for a list of eligible states; AND
- ❖ You are or will be managing excluded HSM in compliance with 40 CFR 261.2(a)(2)(ii), 261.4(a)(23), (24), or (25) (or state equivalent) or you have stopped managing excluded HSM in compliance with the exclusion(s) and do not expect to manage any amount of excluded HSM under the exclusion(s) for at least one year. Do not include any information regarding your hazardous waste activities in this section.

1. Indicate reason for notification. Include dates where requested.

- ☒ Facility will begin managing excluded HSM as of 06/30/16 (mm/dd/yyyy).
- ☐ Facility is still managing excluded HSM/re-notifying as required by March 1 of each even-numbered year.
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2. Description of excluded HSM activity. Please list the appropriate codes and quantities in short tons to describe your excluded HSM activity ONLY (do not include any information regarding your hazardous wastes). Use additional pages if more space is needed.

a. Facility code (answer using codes listed in the Code List section of the instructions)	b. Waste code(s) for HSM	c. Estimated short tons of excluded HSM to be managed annually	d. Actual short tons of excluded HSM that was managed during the most recent odd- numbered year	e. Land-based unit code (answer using codes listed in the Code List section of the instructions)
06	F006		1.3 T	

3. Facility has financial assurance pursuant to 40 CFR 261.4(a)(24)(vi). (Financial assurance is required for reclaimers and intermediate facilities managing excluded HSM under 40 CFR 261.4(a)(24) and (25))

Y ☒ N ☐ Does this facility have financial assurance pursuant to 40 CFR 261.4(a)(24)(vi)?



799 North Pike Road Cabot, PA 16023 - Phone: (724) 352-1507 Fax: (724) 352-4970 www.pennunited.com

August 5, 2016

Ms. Rebecca Serfass
US Environmental Protection Agency, Region III
1650 Arch Street
Philadelphia, PA 19103

Re: Notice of Violation Response, Docket No. R3-16-NOV-RCRA-014
Compliance Evaluation Inspection, August 27, 2014
EPA ID No. PA0000193409
Hazardous Secondary Material Recycling Response

Dear Ms. Serfass,

In response to your July 6, 2016 e-mail requesting additional documentation for the following two questions, I have provided our response below.

- Please demonstrate that the material is being reclaimed legitimately under 40 CFR 261.4(24)(iv) which references **40 CFR 260.43**

Attached are documents on the letterhead of the two companies that reclaim precious metals from the solutions we send to them; Abington Reldan Metals and Advanced Chemical Company. These demonstrate the legitimacy of their processes and that the hazardous secondary material (HSM) meets 40 CFR 260.43 (b)(1) and (b)(2).

- Please demonstrate that the Facility has made reasonable efforts to ensure each reclaimer intends to properly and legitimately reclaim the hazardous secondary material and not discard it under **40 CFR 261.4(24)(v)(B)**.

Penn United Technologies Inc. visits the precious metal reclaim companies frequently to ensure that they are operating in accordance with our agreement with them, to verify that the precious metal solutions are processed properly and to assure proper accounting of the precious metal. The last four visits are documented below. Additional visit dates can be made available once the individual who performs the majority of the audits returns from personal medical leave in mid to late September.

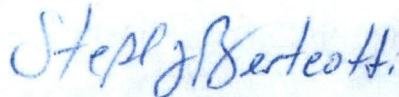
MANUFACTURING SOLUTIONS. ABSOLUTE INTEGRITY. EMPLOYEE OWNED.

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Markets Demanding High Precision
ISO 9001:2008, FDA Registered. ITAR Registered

David Gibson, Process/ Project Manager	October 13-15, 2015	Advanced Chemical
Alexis Sturgill, Plating Chemist	February 1-5, 2016	Advanced Chemical
David Gibson, Process/ Project Manager	May 3-6, 2016	Abington Reldan
Sam Blanchard, Sales Engineer	July 25-28, 2016	Abington Reldan

If you have any questions regarding this response, please contact me at the above number, extension 4610 or by e-mail at Steve_Berteotti@pennunited.com.

Sincerely,



Stephen J Berteotti
EHS Manager

MANUFACTURING SOLUTIONS. ABSOLUTE INTEGRITY. EMPLOYEE OWNED.

Components for Energy, Oil & Gas, Medical, Defense & Aerospace, Fluid Handling, Automotive, Electronics & Telecom and Other
Markets Demanding High Precision
ISO 9001:2008, FDA Registered. ITAR Registered

August 5, 2016

Steve Berteotti, EHS Manager
Penn United Technology
799 North Pike Road
Cabot, PA 16023



ADVANCED CHEMICAL COMPANY
105 Bellows Street, Warwick, R.I. 02888
Tel: 401-785-3434 • Fax: 401-941-9210

Re: Recycling of hazardous secondary materials

Dear Mr. Berteotti,

Advanced Chemical Company operates a state-of-the-art precious metal refining operation at the following locations:

- 1.) 105 Bellows Street, Warwick, RI 02888,
- 2.) 131 Bellows Street, Warwick, RI 02888, and
- 3.) 45 Commerce Drive, Suite B, Warwick, RI 02886

The reclamation of precious metals are referenced in 40 CFR 261.6(a)(iii) and the State of Rhode Island requires our facility to operate under the provisions of 40 CFR, Part 266, Subpart F – Recyclable Materials Utilized for Precious Metal Recovery.

After a review of the material received from your facility, we have determined that the material processing meets the criteria identified in 40 CFR 260.43 – Legitimate Recycling of hazardous secondary materials, specifically, 260.43(b)(1)(iii) and 260.43(c)(1).

The material that Advanced Chemical Company processes for your facility contains economically significant amounts of precious metal (gold, silver, and palladium). The process produces a significant monetary return for your company. These returns may take the form of a purchased product, a financial check, a precious metal return, or as in your case, a wire transfer between financial institutions.

In addition, any waste by-product that may be generated from the reclamation process is handled in accordance with all applicable Federal and State regulations.

Based on this information, Advanced Chemical believes that your material satisfies the requirements of 40 CFR, Part 260.43.

If you have any questions or concerns regarding this matter, please contact me at (401) 785-3434, extension 117.

Respectfully,

Charles J. Volpe
Environmental Manager

CJV: cjv



ABINGTON RELDAN METALS, LLC
ISO14001 Registered www.armetals.com
Maximizing Value From Precious Metal Scrap

August 3, 2016

Abington Reldan Metals (ARM) receives the labeled hazardous materials from Penn United under a permit by rule exemption, 40 CFR Part 266, Subpart F and PA code 25 part 270a.60(b)(5) for treatment of recyclable materials (hazardous waste that is recycled to make the materials suitable for offsite reclamation of economically significant amounts of any precious metals identified). The cyanides in these hazardous materials are destroyed in the precious metals reclamation processes. Through these processes and with the destruction of the cyanides the material is deemed non -hazardous and is sent through our waste water treatment system. At the completion of the scrap processing, ARM returns the value of the metal to Penn United per our contract via bank wire or metals transfer as directed by the customer.

Jessica Chung

EHS Manager

Abington Reldan Metals, LLC

550 Old Bordentown Road

Fairless Hills, PA 19030

Maximizing Value from Precious Metal Scrap ®

Tel: 1-267-316-2000 Ext | **Fax:** 1-267-316-2963

Email: jchung@armetals.com | www.armetals.com

RLS 8/24/16

EPA ID Number PA010101011931409

OMB#: 2050-0024; Expires 01/31/2017

ADDENDUM TO THE SITE IDENTIFICATION FORM: NOTIFICATION OF HAZARDOUS SECONDARY MATERIAL ACTIVITY



ONLY fill out this form if:

- You are located in a State that allows you to manage excluded hazardous secondary material (HSM) under 40 CFR 261.2(a)(2)(ii), 261.4(a)(23), (24), or (25) (or state equivalent). See <http://www.epa.gov/epawaste/hazard/dsw/statespf.htm> for a list of eligible states; AND
- You are or will be managing excluded HSM in compliance with 40 CFR 261.2(a)(2)(ii), 261.4(a)(23), (24), or (25) (or state equivalent) or you have stopped managing excluded HSM in compliance with the exclusion(s) and do not expect to manage any amount of excluded HSM under the exclusion(s) for at least one year. Do not include any information regarding your hazardous waste activities in this section.

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ON SITE TREATMENT

OFF SITE TREATMENT

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01	F006	Gold Solution	29.8 T	NA
01	F006, F011	Silver Solution	1.46 T	NA
06	F006, D008	Filter Press Cake	54.6 T	
06	F006	Gold Solution	7.9 T	
06	F006, F011	Silver Solution	1.4 T	
06	F006	Gold Solids (filters)	0.5 T	
06	F006, F011	Silver Solids (filters)	0.09 T	
06	F006	Palladium Solids (filters)	0.16 T	

3. Facility has financial assurance pursuant to 40 CFR 261.4(a)(24)(vi). (Financial assurance is required for reclaimers and intermediate facilities managing excluded HSM under 40 CFR 261.4(a)(24) and (25))

Y ☒ N ☐ Does this facility have financial assurance pursuant to 40 CFR 261.4(a)(24)(vi)?

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06	F006	Palladium Solution	1.3 T	

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Y ☒ N ☐ Does this facility have financial assurance pursuant to 40 CFR 261.4(a)(24)(vi)?



WORLD RESOURCES COMPANY

170 Walnut Lane
Pottsville, PA 17901

Tel: 570.622.4747
Fax: 570.622.6116

February 28, 2016

Mr. Stephen Berteotti
Penn United Technologies, Inc
795 N Pike Rd
Cabot, PA 16023

Dear Mr. Berteotti:

Enclosed is your Recycling Certificate which provides confirmation that all the recyclable F006 Material accepted from Penn United Technologies, Inc during the calendar year 2015 has been recycled.

By recycling with World Resources Company, you have contributed to the conservation of our world's natural resources. We appreciate you choosing us as your partner in preserving our environment for future generations.

Best Regards,

Edward L. O'Connell

Edward L. O'Connell
Vice President/Director of North American Marketing

ISO 9001, 14001 & 18001 Certified Recycling Facility





World Resources Company

Pottsville Pennsylvania Recycling Facility

Recycling Certificate

*World Resources Company hereby certifies that all the
F006 Material accepted from*

**Penn United Technologies, Inc
Cabot, PA**

*for the year 2015, has been recycled. Thank you for
conserving valuable natural resources and contributing to the
preservation of our environment.*

Kenneth E. Riegel

Senior Vice President, General/Operations Manager

ISO 18001, 9001 & 14001 Certified Recycling Facility





PENN UNITED TECHNOLOGIES

P.O. BOX 399 • SAXONBURG, PA 17355

PLACE STICKER AT TOP OF ENVELOPE TO THE RIGHT
OF THE RETURN ADDRESS, FOLD AT DOTTED LINE

CERTIFIED MAIL™



7012 0470 0000 6938 3860

JUN 14 2016



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